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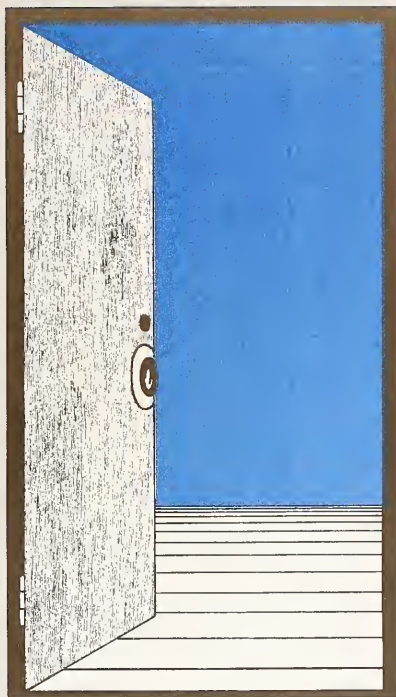
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Areawide Housing Opportunity Plan
For the MAPC Region

Volume 1

Summary Data, Findings and
Proposed Implementation

September, 1979

ABOUT THIS REPORT

The Areawide Housing Opportunity Plan (AHOP) was prepared by the Housing staff of the Metropolitan Area Planning Council. The Metropolitan Area Planning Council is a regional planning council made up of chief-elected officials from 101 greater Boston cities and towns, 11 state agency representatives, and 21 gubernatorial appointees representing minority and consumer interests. MAPC works with communities on issues important to the greater Boston region. Housing, land use, transportation, economic development, water quality, energy, hazardous materials, air quality, and solid waste are current, target issues of MAPC involvement.

The preparation of this report was financially assisted by the cities and towns of the MAPC region and grants from the U.S. Department of Housing and Urban Development.

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Acton

Jonathan G. Truslow
Acting Executive Director

Staff Credits

Writing and research: Harriett Tee Taggart
Michael Shattow
Wendy Plotkin
Marie Gaudet

Assistance: Jonathan G. Truslow

September 1979

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ABSTRACT

The Areawide Housing Opportunity Plan for the MAPC Region (AHOP) was prepared to help individual communities update local housing needs data and develop workable three-year goals and strategies to meet 15 percent or more of the region's housing needs.

The Plan consists of three main elements: an assessment of housing assistance needs for the region and for each community within the region; housing assistance goals for the region and for each community within the region; and three-year implementation strategies to meet locally developed goals.

The AHOP will be of interest to local public officials, housing professionals and citizen advocates concerned about greater Boston housing issues. Approval of the Plan by the U.S. Department of Housing and Urban Development, (HUD) will mean greater local control over the amount and type of federally assisted housing units as well as bonus points to participating communities for certain HUD housing and community development funds.

If the AHOP is awarded bonus funds, additional Section 8, Community Development Block Grant (CDBG) and 701 monies will be made available, on a priority basis, to MAPC communities participating in the Plan.

CHAPTER 1

Housing Needs¹

Overview

In 1970, two out of every seven households in the MAPC region were in need of housing assistance.² These 259,371 households were either occupying substandard units, overcrowded, or paying more than 25 percent of their adjusted gross income for housing.

Over the past eight years, substantial progress has been made in meeting both elderly and family needs. As summarized in Table 1.1 below, close to 60,000 households have been assisted, largely through federal and state rent subsidy programs in existing, newly constructed, or rehabilitated units.

Table 1.1: Comparison of Regional Housing Needs in 1970 and 1978

Household Type	1970 Need ⁽¹⁾		1978 Need ⁽²⁾	
	Number	Percentage	Number	Percentage
Elderly	107,122	41%	84,719	41%
Family	152,249	59%	120,015	59%
TOTAL	259,371	100%	204,734	100%

Sources: (1) MAPC. Low and Moderate Income Housing Needs in the Boston Region. October, 1974.

(2) MAPC staff calculations based on data provided by DCA, verified and in some cases revised by local officials.

¹ This Chapter addresses HUD requirements specified in sections 891.503(a) and (b)(1)(4), and (6); and, 891.505(b)(6).

² Metropolitan Area Planning Council, Low and Moderate Income Housing Needs in the Boston Region. October, 1974. This report was developed from data obtained from the state Department of Community Affairs.

On a regional level, housing assistance to families has been substantial. However, most of this assistance has been in subareas of the region where job growth and, hence, opportunities for employment have been minimal.

The distribution of family and elderly housing assistance to reduce overall need since 1970 is illustrated in the following table.

Table 1.2: Number of Assisted Units Provided in
Negative Outreach versus Positive Outreach
Communities (1970 to 1978)

Communities	Family Housing		Elderly Housing	
	Number	Percentage	Number	Percentage
Negative Outreach Communities (15)	27,985	83%	13,533	57%
Positive Outreach Communities (86)	5,850	17%	10,397	43%
TOTAL (101)	33,835	100%	23,930	100%

Negative outreach communities, those with declining economic bases, relatively weak fiscal capacity, and substantial proportions of lower income households, have assumed a disproportionate share of the family assisted units. Elderly assistance has been somewhat more evenly distributed throughout the region.

This chapter will present, in accordance with HUD requirements for an approvable plan, an areawide assessment based upon uniform and consistent data of the housing assistance needs of lower income households. This assessment is broken down by (1) household type (elderly, small and large family), (2) housing tenure (owner and renter), and (3) special needs groups (female-headed, handicapped, and minority households), and (4) households displaced or to be displaced by governmental action. In this chapter, needs data is summarized on a regional and subregional basis. Appendix B in Volume 2 presents the same information for all 101 jurisdictions, regardless of population size.¹

¹ 891.503(a) requires this information only for individual communities with populations of 25,000 or more and, for the remaining areas, a summary by county. MAPC has historically developed this information for all municipalities and has, thus, provided it in greater detail.

After a brief discussion of the methodology used to develop these needs data, regional and subregional housing needs are first assessed on the basis of the number of assisted units needed relative to the total number of units in the area. This measure calibrates the magnitude of remaining need compared with the present size of the individual or sub-regional area. Second, regional needs are evaluated by household type, tenure type, and special needs groups. Third, units needed in the sub-regional area are assessed relative to the areawide need. This measures the distribution of effort required to meet areawide needs. Fourth, the breakdown of housing needs within each subregion by household and tenure type is examined. Finally, data on trends in the private housing market are presented.

Methodology Used to Develop Original Housing Needs Numbers and Updates by MAPC¹

Housing needs were developed from 1970 Census data by examining the relationship between household income and size and the corresponding number of standard units by size and price distribution which would accommodate these households. Housing needs amounted to the shortfall between households and the available housing units in adequate condition.

Elderly needs were calculated on the basis of the shortfall between elderly household needs and the supply of appropriate housing units in each individual community. Family housing needs were derived on the basis of not only indigenous need, but also the number of households which could be expected to reside in those communities where economic vitality, both increases in employment opportunities and fiscal capacity, would sustain expanding housing opportunities.

This methodology has been applied consistently, with a few minor modifications by individual communities, since the early 1970's. Thus, it offers not only a current assessment of housing needs within and between jurisdictions, but also provides a basis for assessing the extent to which housing efforts since 1970 have addressed these needs.^[2] Current housing needs figures have been derived by subtracting the number of assisted units provided between 1970 and 1978 from the housing needs figures in 1970. Further breakdowns by housing tenure (owners and renters), small and large families, and special needs groups were calculated on the basis of corresponding proportions in the 1970 population.

The initial sections in this chapter will focus primarily on the applicability of this data base to assessing the remaining or current housing need. The final section summarizes recent trends in household income and the private housing market and the extent to which these changes may have significant implications for increasing numbers of households in need of assistance throughout the region.

¹ See Volume 2, Appendix C for a more detailed description of housing needs methodology.

² Although housing needs have been updated annually to account for housing assistance which has been provided, demographic shifts which have occurred since 1970 are not reflected in the 1978 housing needs numbers. It is anticipated that data from the 1980 census will be available prior to the next three year AHOP cycle so that population shifts and changes in housing needs can more accurately be gauged.

Housing Needs in the MAPC Region as of 1978

Over 21 percent of the region's households, 204,734 out of 933,774 are still in need of housing assistance. A breakdown of these regional housing needs by individual communities indicates that not only is there a concentration of these households in the Core area, but a fairly high proportion in a significant number of suburban communities as well (See Figure 1-A). Assisted housing units needed as a percent of total housing units amount to at least six percent or more in all communities.

Table 1.3: Housing Need in Each MAPC Community
as a Percent of Total Housing Units

<u>Percentage of Housing Units Needed</u>	<u>Number of Communities</u>
6-10%	19
11-15%	46
16-20%	28
≥ 21%	8
	<u>101 TOTAL</u>

Thus, housing needs relative to the size of local housing stock is somewhat evenly distributed throughout the region with the majority of communities requiring housing assistance for an additional 11 to 20 percent.

Housing Needs by Household and Tenure Type

Of the total 204,734 assisted units needed in the region, 119,993 units, or over half, are needed by families and the remaining 84,741 for the elderly. Among family and elderly households in need of assistance, 64 percent are presently renters and 36 percent are owner occupants.

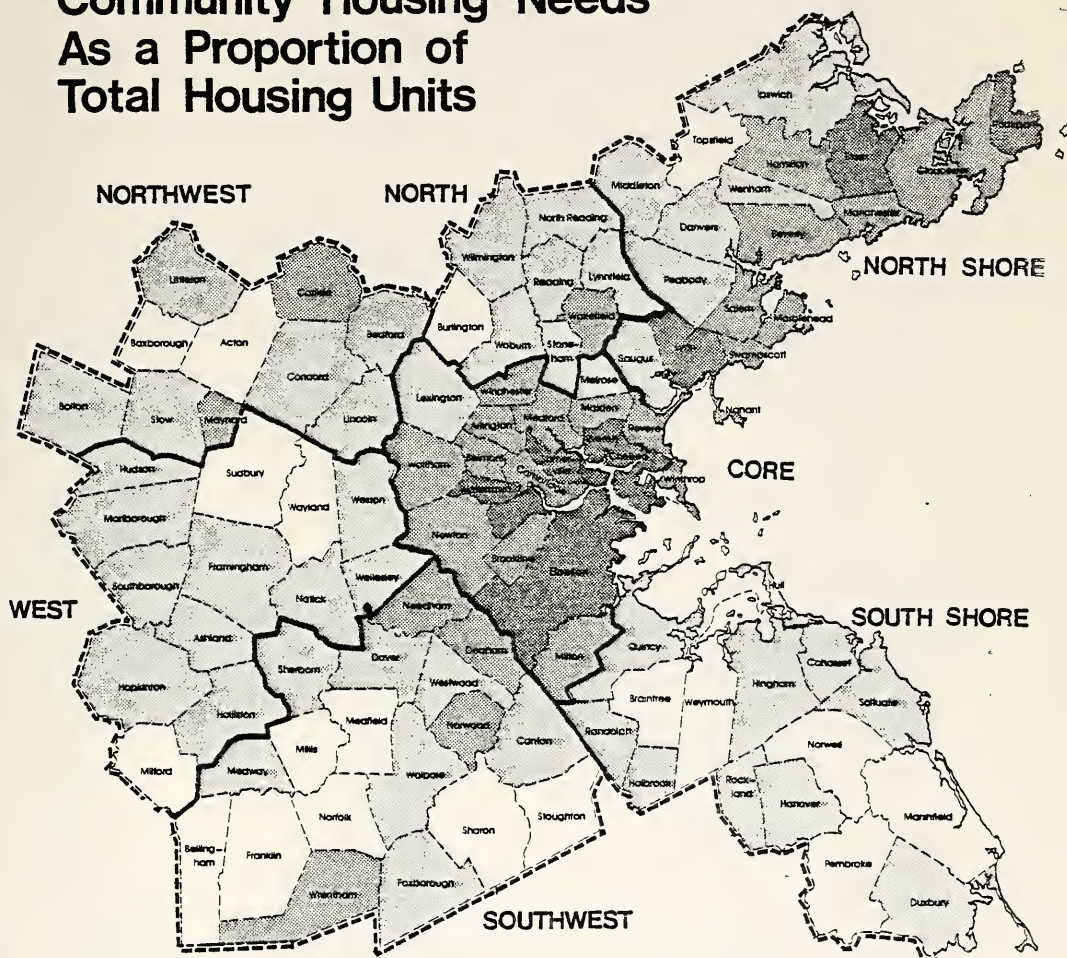
Table 1.4: Summary of Regional Housing Needs
by Household and Tenure Type

<u>ALL HOUSEHOLDS, BY TYPE</u>	<u>TOTAL</u>	<u>OWNER</u>	<u>RENTER</u>
Family	119,993	38,234	81,759
Small Family (4 persons or fewer)	97,344	29,429	67,915
Large Family (5 or more persons)	22,649	8,805	13,844
Elderly	84,741	36,381	48,360
<u>TOTAL</u>	<u>204,734</u>	<u>74,615</u>	<u>130,119</u>

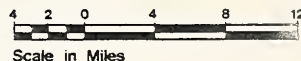
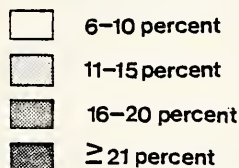
Source: Mass. Department of Community Affairs. Housing Needs in Massachusetts as of 1/1/78, with additional computations by MAPC Housing staff and input from local officials.

Figure 1-A

Community Housing Needs As a Proportion of Total Housing Units



LEGEND



Distribution of need for subsidized housing units throughout the MAPC region is expressed by the proportion of total need to total housing units in each community.

SOURCE: Massachusetts Dept. of Community Affairs, Housing Needs in Massachusetts as of 1-1-78.

Additional breakdowns indicate that housing of special needs groups are substantially greater than the proportion of the total households in the region. For example, minority households represent only about 5 percent of the regional population, but minority needs constitute over 10 percent of all regional housing needs. As indicated in Table 1.5 below, minority needs are weighted more heavily toward families and renters than are the housing needs of the general population given in Table 1.4.

Table 1.5: Summary of Regional Housing Needs
By Special Needs Groups

ALL HOUSEHOLDS, BY TYPE	TOTAL	OWNER	RENTER
<u>Minority Households</u> ⁽¹⁾			
Family	17,073	3,052	14,021
Small Family (4 persons or less)	12,371	2,093	10,278
Large Family (5 or more persons)	4,702	959	3,743
Elderly	5,115	1,721	3,394
SUBTOTAL	22,188	4,773	17,415
<u>Female Headed Households</u>	31,176	8,979	22,197
<u>Handicapped Households</u>	25,284	--	--
Physical Disability ⁽²⁾	20,834	--	--
Mental Disability ⁽³⁾	4,450	--	--
<u>Displaced Persons</u> ⁽⁴⁾	362	--	--

Sources: Massachusetts Department of Community Affairs, Housing Needs in Massachusetts as of 1/1/78, with additional computations by the MAPC Housing staff and input from local communities.

- (1) Minority housing needs include Black and Hispanic persons only. Information for American Indians, Asians and Eskimos is too fragmentary to ascertain housing needs.
- (2) Massachusetts Association of Paraplegics. Housing Needs of the Handicapped, November, 1970.
- (3) Massachusetts Department of Public Health, The Health Care Needs of the Elderly and Chronically Disabled in Massachusetts, March 1975.
- (4) Obtained from Housing Assistance Plans for 18 out of 21 HAP communities and AHOP Community Information questionnaire for 11 out of 80 non-HAP communities.

Other special needs groups include female-headed households which comprise 15 percent of the total needs, handicapped households which amount to approximately 12 percent, and displaced persons who, in any given year, amount to a relatively small percentage of total remaining need.

Subregional Housing Needs as a Share of Remaining Regional Need

On a subregional basis, the Core houses the majority of the region's households (54 percent) and an even greater percentage of those households in need of assistance (65 percent), as indicated in Table 1.6 below. Among the other subregions, only the North Shore has housing needs over 10 percent of the region's remaining need. This percentage is proportional to its present share of the region's households. In the remaining subregions, the number of households as a percentage of those in the region range from 2 percent to 10 percent and, in all cases, their share of the region's need, both indigenous and expected to reside, amounts to 7 percent or less.

Table 1.6: Subregional Housing Needs as a Percentage of Regional Housing Need

Subregion	Total # Households (% of Region)	Total Housing Needs (% of Region)	Family Housing Needs (% of Region)	Elderly Housing Needs (% of Region)
Core	54%	65%	66%	64%
North Shore	13	13	11	15
North	5	3	3	3
Northwest	2	2	2	1
West	8	5	5	5
Southwest	7	5	6	5
South Shore	10	7	7	7
MAPC REGION	100% (933,774)	100% (204,734)	100% (119,993)	100% (84,741)

Distribution of Housing Needs Within Each Subregion by Household and Tenure Types

Within each subregion, family needs are proportionately greater than elderly needs. This is particularly true outside of the North Shore subregion, where family needs are less than the regional average of 59 percent. In other subregions, family needs account for 58 to 65 percent of remaining need.

Table 1.7: Family and Large Family Needs
Relative to Total Remaining
Need by Subregion (1/1/78)

Subregion	Family Need as a Percent of Total Remaining Need	Large Family Needs as a Percent of Family Remaining Need
Core	59%	19%
North Shore	52	16
North	58	20
Northwest	65	26
West	59	20
Southwest	61	22
South Shore	60	21
MAPC REGION	59% (119,993)	19% (22,649)

In all subregions, large family needs, i.e., households of five or more persons, comprise anywhere from one-seventh to one-fourth of remaining family need.

Needs by tenure type within each subregion correspond very closely to the predominant housing stock found in each subregion. (Table 1.8). The Core and North Shore subregions, both with significant tenant populations, account for over 85 percent of all renter household needs but only about 64 percent of all owner needs. Within each of these subregions, renter needs account for 72 percent and 61 percent of subregional needs respectively. Similarly, in the remaining subregions, single family housing is prevalent and housing needs are accordingly greater among owner households.

Table 1.8: Distribution of Housing Needs
by Housing Type and Tenure
Within Each Subregion

Subregion	Family		Elderly	Total
	Small Family (%)	Large Family (%)		
<u>Core</u>				
Owner	10%	3%	15%	28%
Renter	38	8	26	72
SUBTOTAL	48%	11%	41%	100% (133,609)
<u>North Shore</u>				
Owner	15%	4%	20%	39%
Renter	28	5	28	61
SUBTOTAL	43%	9%	48%	100% (25,607)
<u>North</u>				
Owner	26%	9%	27%	62%
Renter	21	2	15	38
SUBTOTAL	47%	11%	42%	100% (6,943)
<u>Northwest</u>				
Owner	30	11%	24%	65%
Renter	18	6	11	35
SUBTOTAL	48%	17%	35%	100% (3,333)
<u>West</u>				
Owner	22%	8%	23%	53%
Renter	26	4	17	47
SUBTOTAL	48%	12%	40%	100% (10,853)
<u>Southwest</u>				
Owner	27%	10%	24%	53%
Renter	21	4	14	47
SUBTOTAL	48%	14%	38%	100% (10,693)
<u>South Shore</u>				
Owner	25%	8%	26%	59%
Renter	22	4	15	41
SUBTOTAL	47%	12%	51%	100% (13,696)
MAPC REGIONAL TOTAL	48% (97,344)	11% (22,649)	47% (84,741)	100% (204,734)

Trends in Household Income and the Private Housing Market

An MAPC report published in 1976 identified three growing problems in the unassisted housing market in metropolitan Boston.¹

- changes in family income relative to overall housing costs
- price trends of new and existing housing, and
- increasing costs of homeownership, particularly mortgage financing.

Additional problems include demographic indicators that the "baby boom" is now entering the housing market and compounding pressures on the shortfall in supply of housing in the Boston region.²

Over the past eight years, housing-related costs have outpaced increases in the costs of consumption items generally. (See Figure 1-B) Increases in utility costs by over 100 percent have been the most pronounced and are likely to have significant effects on homeowners and renters alike.

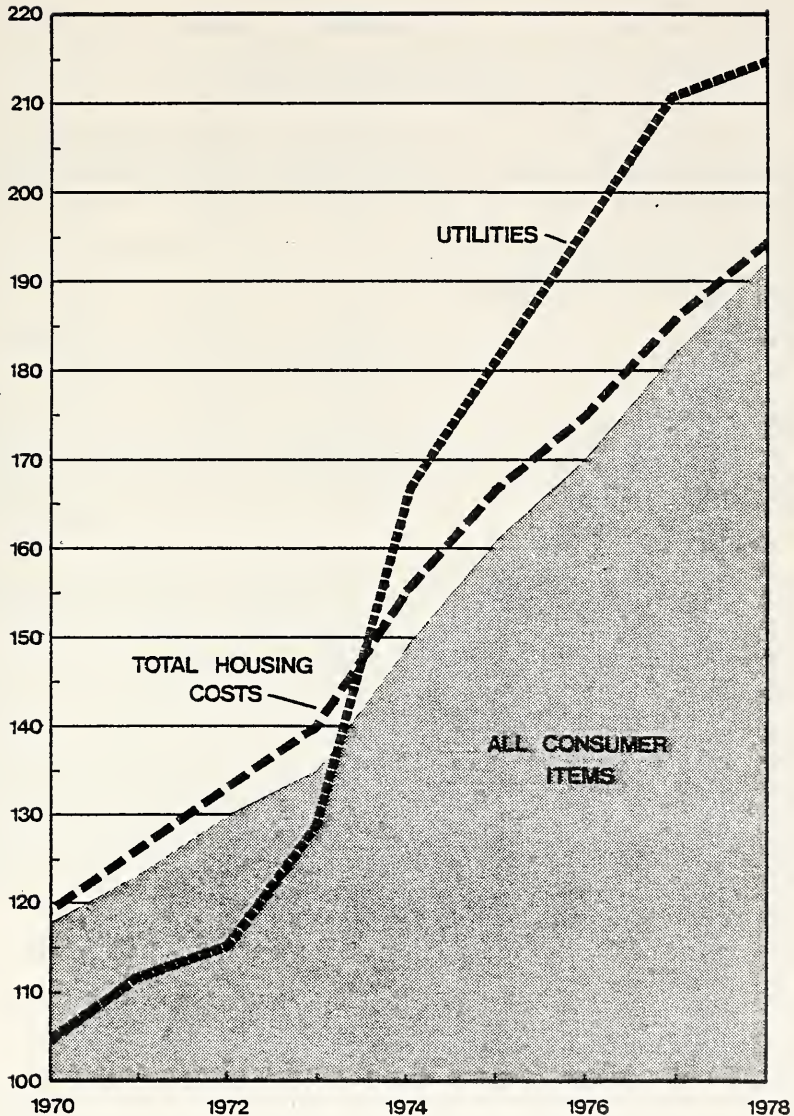
Costs of homeownership have increased such that more households are likely to be priced out of the market. Two sources of these costs are substantial increases in (a) prices of existing and newly constructed houses, and (b) mortgage financing charges. Between 1970 and 1978, the average sale price of a new single-family home in metropolitan Boston has increased from \$44,958 to \$68,000, or 51 percent. For existing homes, the increase has been somewhat greater, from \$35,400 to \$54,000, or 55 percent. The major increases in mortgage financing costs are attributable to both the greater dollar amount of the mortgage, as a result of increased purchase prices, as well as steadily higher interest rates. While in 1970 the income required to purchase an average priced home was 115 percent of the median household income, by 1978 a household needed an income of 123 percent above the median for all households in metropolitan Boston. (See Table 1.9) Thus, as housing related costs have outpaced general increases in income, the need for housing assistance in metropolitan Boston has become that much more acute.

¹ Metropolitan Area Planning Council, Problems Involving the Supply of Housing in the Boston Region (Boston: The Council, 1976) p. 11.

² These trends documented by the Office of State Planning in Massachusetts and past MAPC reports. See Chapter 3 for further discussion.

Figure 1-B

Cost Trends in the Boston SMSA For Select Categories



1967 = 100

SOURCE: BLS, Consumer Price Index

Table 1.9: Homeownership Costs on Conventional Mortgage

Costs	1970	1974	1978
Average Sale Price of Existing Home (\$)	35,400	43,800	54,700
Downpayment Required on Conventional Mortgages (20%)	7,080	8,760	10,940
Mortgage Amount (\$)	28,320	35,040	43,760
Contract Term to Maturity (years)	25	25	25
Average Effective Interest Rate for (%) Existing Home Mortgages	8.50%	9.08%	9.25%
Yearly Expense ⁽¹⁾	2,706	3,525	4,625
Income Required (20%)	13,530	17,625	23,125
HUD Median Income ⁽²⁾	(1969) 11,691	N.A.	18,800

Sources: Federal Home Loan Bank, Boston, News, annual average available for 1970 and 1974, monthly averages calculated for 1978; HUD Office of Economic Affairs, Economic Market Analysis Division, Boston Area Office, Dec. 1, 1978.

- (1) Yearly Expense is based on the 12 month cost of mortgage principle and interest.
- (2) Income Estimate is based on a 20 percent rule of thumb for principle and interest as a percent of income. These figures do not include property taxes and casualty insurance. If these costs amount to more than an additional 5 percent, income required may be even greater (no more than 25 percent of income should go to PITI (Principal, Interest, Taxes, and Insurance)).

CHAPTER 2

Degree of Concentration¹

A key component of an areawide housing opportunity plan is to identify areas of undue concentration of low income and minority households. MAPC has developed several measures for such identification:

- 1) The incidence of low income and minority families (Table 2.1),
- 2) Present locations of assisted housing (Table 2.2), and
- 3) Each subregion's and community's relative share of the region's assisted units (Table 2.4).²

Concentration is measured by comparing the total number of households and housing units within each community with the number of assisted households and housing units. This approach provides both a control for individual differences among communities and a regionwide indicator of concentration.

Concentration of Low Income and Minority Households

Table 2.1 indicates high concentrations of low-income households³ and minority households within the Core subregion, and lower concentrations of these groups within the rest of the MAPC subregions. Overall 21 percent of the region's households are low-income families requiring housing assistance, and 5 percent are minority households. In contrast, over 26 percent of the Core's households are lower-income, and 9 percent are minority households. Another way to assess this concentration is to note that the Core subregion contains 65 percent of the region's lower-income households, and 91 percent of the region's minority households, in comparison to its 54 percent share of the region's total households.

¹ This Chapter addresses HUD requirements specified in sections 891.503(b)(3) and (b)(4).

² Information by individual community is located in Appendix B of Volume 2 of this document.

³ On the recommendation of the HUD Area Office, MAPC has specifically looked at those low-income households requiring housing assistance. The figures for "Low-Income Households" on Table 2.1 are therefore the same as "Remaining Need as of 1/1/78" in Table 1.8.

Table 2.1: Low-Income and Minority Households by Subregion as of 1/1/78

Subregion	Total Number of Households	Low Income Households (1)		Minority Households (2)	
		Number	Percentage of Total Households	Number	Percentage of Total Households
Core	506,233	133,609	26	43,204	9
North Shore	119,666	25,607	21	1,400	1
North	46,568	6,943	15	237	1
Northwest	21,146	3,333	16	155	1
West	72,963	10,853	15	1,069	1
Southwest	70,412	10,693	15	453	1
South Shore	96,786	13,696	14	771	1
REGION	933,774	204,734	21	47,289	5

Sources: (1) Massachusetts Department of Community Affairs, Housing Needs in Massachusetts as of 1/1/78.

- (2) U.S. Census of Population and Housing 1970, First Count Summary Data-Negro households.
 U.S. Census of Population and Housing 1970, Fourth Count-Hispanic households.
 Other minorities are not included because of incomplete data.

This concentration of low-income and minority households indicates a need to expand housing opportunities for low-income households in the outer portions of the region. MAPC recognized the desirability of such an objective in its housing element submitted to HUD in 1978, by adopting the following goal:

All communities to be receptive to all age, income and minority groups in all areas of the region, to facilitate freedom of choice and equal access to employment, sound neighborhoods, and public services.¹

This Areawide Housing Opportunity Plan further implements this goal.

¹ Metropolitan Area Planning Council, Metropolitan Boston Regional Housing Strategy, (Boston: The Council, 1978), April, 1978, p. 5

Locations of Assisted Housing

Present locations of assisted housing within the region are examined in Table 2.2 and geographically displayed in Figure 2-A. Overall, 8 percent of the region's housing units are assisted by some form of subsidy. Again, the Core subregion is overrepresented in this category since 11 percent of its total housing units are assisted. The rest of the subregions within the MAPC area fall below the average, ranging from the North Shore with a high of 7 percent of its units being assisted, to the Northwest with a low of 2 percent. Figure 2-A indicates that in the majority of communities in the region, less than 4 percent of the total housing units within the community are assisted. Of these 51 communities, only six lie within the Core subregion. Of the eight communities with assisted housing exceeding 10 percent of the total units, half lie within the Core subregion.

As a matter of adopted policy, MAPC has endorsed and promoted the concept that a sensitive balance must be struck between providing assisted housing where needs exist and developing such housing in areas of lesser existing need where expanding employment opportunities exist.¹ Impacted communities--cities and towns with assisted housing exceeding 10 percent of their total housing stock--will be targeted for special outreach efforts.² Outreach programs identify low-income households willing to move to areas with low concentrations of assisted housing. Often, the lack of affordable housing is the sole economic barrier preventing households from moving to these areas.

MAPC is also concerned that, in their efforts to provide assisted housing, communities meet the needs of all household types.³ Table 2.2 compares subregional efforts at meeting the needs of the elderly and of families. Overall, as of January 1, 1978, 34 percent of the region's needs for family housing had been met, as opposed to 28 percent for elderly. However, the apparent emphasis on providing family housing is due to the Core which is the only subregion to meet a greater proportion of family need than elderly need. Excluding the Core, subregional totals provide the following profile:

¹ Metropolitan Area Planning Council, Metropolitan Boston Regional Housing Strategy, April, 1978, p. 9. "The Council...supports efforts to provide greater choice of housing location for minority and low and moderate income households. Elderly housing distribution should be based on the needs of the local elderly population; family housing distribution should be related to the needs of both existing families and of families which could take advantage of existing and future employment opportunities."

² Of the 101 communities in the region, eight are designated as impacted. These are: Boston, Cambridge, Chelsea, Lynn, Malden, Milford, Quincy and Salem. All of these are also designated as negative outreach communities, i.e., those with declining economic bases, relatively weak fiscal capacity as well as concentrations of low-income households. An additional seven communities designated as negative outreach communities are: Everett, Gloucester, Marlborough, Norwood, Pembroke, Somerville and Waltham.

³ Metropolitan Area Planning Council, Metropolitan Boston Regional Housing Strategy, op. cit. "The Council supports efforts to achieve a balance in the distribution of subsidized housing resources, proportional to the needs identified in each community, by family type."

Table 2.2: Locations of Assisted Housing as of 1/1/78

Subregion	Assisted Units(1) Total Units(2)	Total Assisted Units Through 1/1/78		Total % of Need Met(3)		Total Assisted Units, 1/1/70-1/1/78	
		Elderly	Family	Elderly	Family	Elderly	Family
Core	11%	17,909	49,207	25	39	13,316	25,225
North Shore	7	5,247	4,608	29	27	3,349	3,320
North	4	1,153	752	28	16	574	414
Northwest	2	360	241	22	10	258	228
West	5	2,168	2,764	33	30	1,305	1,488
Southwest	4	2,288	1,062	35	14	1,435	696
South Shore	6	4,289	3,464	44	30	3,693	2,464
REGION	8%	33,414	62,098	28	34	23,930	33,835

Source: Massachusetts Department of Community Affairs, Housing Needs in Massachusetts as of 1/1/78.

- (1) For purposes of the Areawide Housing Opportunity Plan, HUD counts as "Assisted Units" only those newly subsidized units that maintain the subsidy over a period of years. One-time rehabilitation subsidies are therefore not included.
- (2) The figure for total household units (as of 1/1/78) was calculated by the MAPC Housing Department based upon information from the 1970 U.S. Census (First Count) and building permit data obtained by MAPC. This figure reflects all occupied units in the 1970 Census plus a proportion of all building permits issued since 1968 (under the assumption that a small proportion of permits issued in 1968 and 1969 were not completed in time for the 1970 Census). The relationship between building permits and actual units constructed was calculated in an unpublished 1976 MAPC Housing Department report. This report concluded that, regionwide, 93 new units were built for every 100 building permits issued.
- (3) MAPC added "pre-1970 Effort" to "1970 Need" in order to arrive at an estimate for "Total Need"

Table 2.3: Comparison of Family and Elderly Efforts
With Core Subregion Excluded

	<u>Family Units</u>	<u>Elderly Units</u>
Regional 1970 Need (Excluding Core)	53,044	46,377
Regional Effort (Excluding Core)	12,891	15,505
Percent of Need Met	24%	33%

In making recommendations to HUD for future housing allocations, MAPC will continue giving prime consideration to the balance between family and elderly housing. MAPC will encourage communities with substantial elderly-assisted housing to apply for family housing through technical assistance and program incentives. MAPC's review process will also give lower priority to proposals for elderly housing within such communities.¹ This conforms with the program objective, since families are more likely to seek mobility within the region.

Relative Need/Effort

The imbalance between the Core and the rest of the subregions' efforts in providing assisted housing, and the extent to which they have met family and elderly needs, is further documented in Table 2.4. With 54 percent of the region's households, the Core subregion has provided over 70 percent of the region's assisted housing. None of the other subregions have provided assisted housing proportional to their share of the region's households.

The imbalance between meeting the needs of both household types is even more pronounced. Here, the Core, West and South Shore are the only subregions to have made substantial progress in meeting their proportion of the regional 1970 family needs. Every other subregion has failed to meet its share of the regional family need as of 1970.

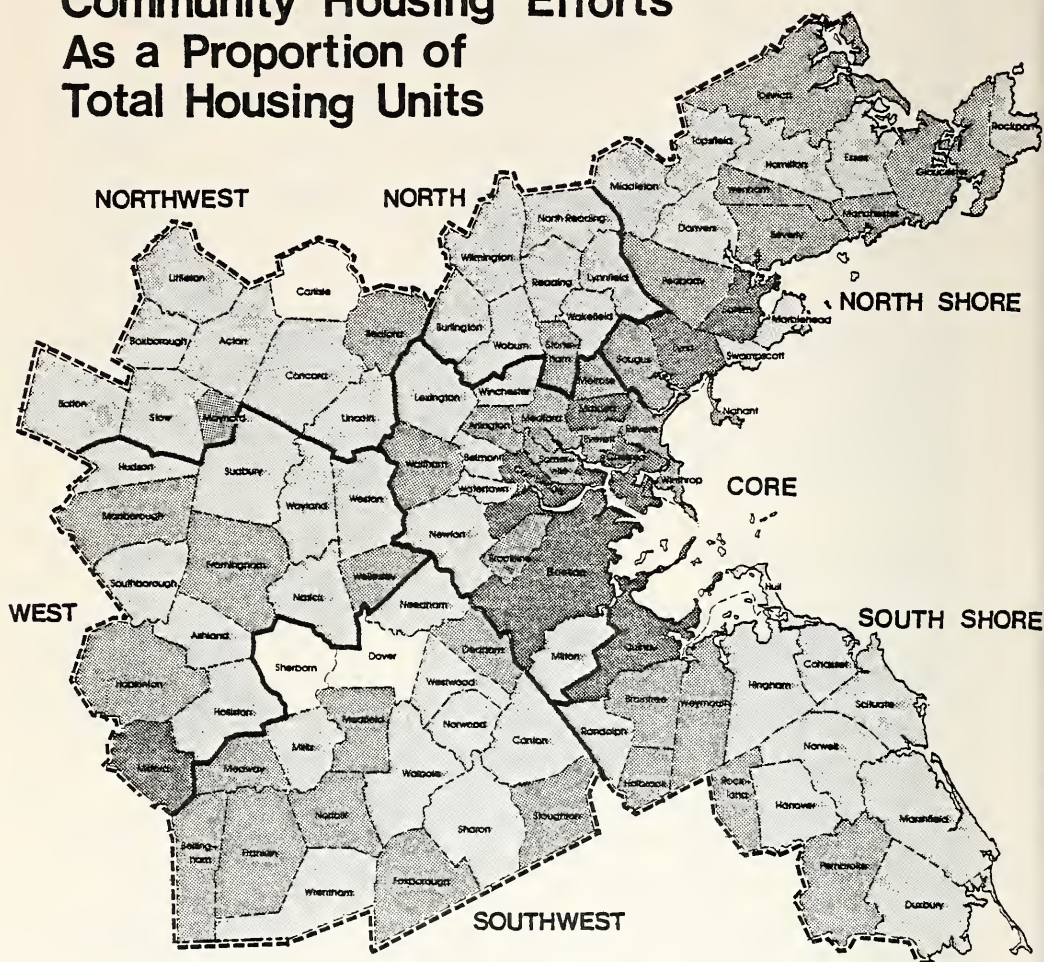
On the other hand, four of the seven subregions have exceeded their share of the region's elderly need in providing housing assistance. Only the Core subregion has provided less than its 1970 proportion of need. While realizing the urgency involved in meeting the needs of the elderly, MAPC also recognizes the limited assistance available to meet the needs of its elderly and family populations, especially those households expected to reside in jurisdictions on the basis of available and expanding employment opportunities.²

¹ Ibid. "A-95 Review": "In reviewing...applications, in accordance with federal law and regulations, the Council will give highest priority to those applications which will directly provide increased housing opportunities for low and moderate income households..." Also, see Chapter 5, Section A of this document.

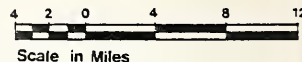
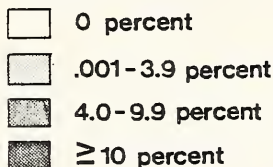
² See Chapter 3 and Appendix C/Housing Needs Methodology.

Figure 2-A

Community Housing Efforts As a Proportion of Total Housing Units



LEGEND



Distribution of assisted housing units throughout the MAPC region is expressed by the proportion of total assisted units to total housing stock in each community.

SOURCES: Massachusetts Dept. of Community Affairs, Housing Needs in Massachusetts as of 1-1-78, Building Permit Data 1970-77, U.S. Census, First Count 1970

Table 2.4: Assisted Housing Effort as a Percentage of MAPC Regional Assisted Housing Effort

As of 1/1/78

Subregion	% of Region. Hshlds.	Total Effort		Elderly Effort		Family Effort	
		Percent of Original Need	Percentage of Regional Effort	Percent of Original Need	Percentage of Regional Elderly Need	Percent of Original Need	Percentage of Regional Family Effort
Core	54%	67%	70%	61%	54%	71%	79%
North Shore	13	12	10	15	16	10	7
North	5	3	2	3	3	3	1
Northwest	2	1	1	1	1	1	*
West	8	5	5	5	6	5	4
Southwest	8	5	4	5	7	4	2
South Shore	10	7	8	8	13	6	6
REGION	100% (933,774)	100% (299,487)	100% (95,512)	100% (119,152)	100% (33,414)	100% (180,335)	100% (62,098)

* Less than 1 percent.

Source: Massachusetts Department of Community Affairs, Housing Needs in Massachusetts as of 1/1/78.

These tables reveal a concentration of housing needs and efforts within the Core subregion. Several communities scattered throughout the region also show significant efforts at meeting the needs of lower-income households.

In Chapter 3, the movement of employment opportunities to areas outside of the subregion will be discussed. If lower-income households are to take advantage of these opportunities, communities with relatively little assisted housing currently will need to increase their share of the region's assisted housing. This effort will need to be directed at families as well as the elderly, since families are the most likely to require and seek new employment opportunities.

CHAPTER 3

Development Patterns in the MAPC Region¹

Locations for assisted housing cannot be addressed in the abstract at the regional level. A public or private developer or an individual household utilizing assistance programs must consider a number of factors before settling on an appropriate location. These factors include population shifts throughout the region, the movement of employment opportunities away from the Core and costs associated with development. Also, legal and statutory barriers often discourage development of subsidized housing even where it is needed. Zoning laws and subdivision requirements, for example, may directly or indirectly prohibit the types of units most affordable by lower-income households and easiest to subsidize by government.

Population Trends

Since the end of World War II, the Boston metropolitan area has experienced major demographic changes. Between 1950 and 1975, the region's population increased by 514,137 reflecting an overall increase of 20 percent, or an annual increase of .8 percent. Although the region's older urban centers gradually declined in population, outlying suburban and rural communities showed rapid and substantial growth.

An examination of Table 3.1 reveals that the Northwest subregion led the region in growth, while the Core showed the only decrease in population. A previous MAPC study of the region noted the following:

Those communities with a decline in population, or with only a slowly growing population, have generally experienced an outmigration of family households who moved to suburban locations further out. The elderly and the less affluent have tended to remain in the inner and Core communities. Additional immigration to these communities has generally been comprised of lower-income households and minority groups, young households,² households without children and in some communities, students.²

¹This Chapter addresses HUD requirements specified in Sections 891.503 (b)(2); 891.503 (b)(6); 891.503 (e), and Section 891.504 (c).

²Metropolitan Area Planning Council, The State of the Region, (Boston: The Council, 1978), p. 5.

Table 3.1: Subregional Population-Actual & Projected

Subregion	Number of Communities	1970	1975	1980(P)	1985(P)	Percent Change 1950-75		Percent Change(P) 1975-85	
						Total	Annual	Total	Annual
Core	19	1,534,524	1,491,247	1,483,900	1,487,200	-10.7	-.4	*	*
North Shore	19	390,006	376,971	390,100	402,050	22.5	.9	6.7	.7
North	7	156,418	160,717	170,900	180,300	86.9	3.5	12.2	1.2
Northwest	10	78,299	83,632	90,250	98,400	153.4	6.1	17.7	1.8
West	13	257,095	267,970	295,900	311,300	100.9	4.0	16.2	1.6
Southwest	18	260,595	272,724	292,200	310,800	108.4	4.0	14.0	1.4
South Shore	15	336,798	360,933	382,150	399,300	79.8	3.2	10.6	1.1
REGION	101	3,013,735	3,014,194	3,105,400	3,189,350	20.1	.8	5.8	.5

Source: U.S. Census, 1970

Massachusetts State Census, 1975

Central Transportation Planning Staff Socioeconomic Forecast II,
July, 1977

*Less than one percent.

(P) Projected

The region's growth rate has decreased considerably since 1970 due to a number of factors including the slowdown of the national economy and the comparative attractiveness of other regions in the country. Population projections for the MAPC region for the period 1975-85 show about one-half of one percent annual change for the ten-year period.

According to projections, the Core subregion will continue to lose population, though at a slower pace than in recent years. The other six subregions will show a comparatively moderate growth, with the North-west subregion still leading in growth.

The rising price of gasoline, however, will affect future population trends. Many residents, living in the suburban communities while working in the Core subregion, will respond to the higher cost of fuel by using public transportation and/or car pools. Others will choose to move within greater proximity to the city. This movement of young professionals has already been evident in the city of Boston over the last ten years.

The number of households is growing at a much faster pace than the population as those born in the 1950's "baby boom" are now forming households of their own. As stated in the Metropolitan Boston Regional Housing Strategy, the region's population will increase by approximately 371,900 persons, over the next 25 years (or less than half a percent yearly). However, the number of households is estimated to increase by 228,138 or slightly less than one percent per year. Adding to this the new units required to replace demolished housing, 362,460 new units will be needed in the region by the year 2000.¹

The need for new housing will be shared by households in all income ranges although any shortfall will likely lie more heavily on the shoulders of the lower-income population of the region. This is partly because of the increased cost of housing documented in Chapter 1. More pertinent, however, is the pressure on prices due to the increased number of households competing for such housing. This will force lower-income persons to remain in the Core subregion, where the demand for available units will be the least. Low-income persons are also the least likely to be able to afford the costs of moving and commuting to work. It is likely, therefore, that there will be little shift in the lower-income population of the region, with the exception of an involuntary movement from Boston to other areas within the Core subregion to accommodate the influx of young professionals. Such a prediction emphasizes the importance of an Areawide Housing Opportunity Plan to overcome this barrier of high prices.

¹Metropolitan Area Planning Council, Metropolitan Boston Regional Housing Strategy, p.7

Employment Trends

The relationship between the location of jobs and the location of housing is significant for two major reasons:¹

- 1) The relationship determines the length of time and mode of travel required for the journey to work; and
- 2) For individual households, it may determine opportunities for economic mobility.

Certain industries, such as manufacturing, have a high percentage of unskilled, entry-level jobs, and the location of these jobs may indicate where the potential for employment of lower-income households is greatest.

An examination of employment figures for the period 1970-75 reveals an increase of 340,443 jobs, or 34 percent within the MAPC region. Growth in transportation, service, finance, wholesale, and retail employment accounted for the overall increase in regional employment. The manufacturing industry, on the other hand, showed a decrease of 9,459 jobs, or 3 percent, for the same period. The loss in manufacturing jobs was not uniform throughout the region. As Table 3.2 indicates, three subregions experienced an increase (North, Northwest, Southwest), while the Core, North Shore, West, and South Shore all experienced a decline in manufacturing employment. In 1975, the Core subregion was still the largest employer of manufacturing jobs, with 45 percent of such jobs within the region. The North Shore came next, with 14 percent, and the Northwest has the lowest portion, or 6 percent. Thus, manufacturing appeared to be moving out to those subregions which traditionally have had the lowest proportion of the region's manufacturing jobs.

Table 3.2: Subregional Trends in Manufacturing
Employment, 1970-75

<u>Subregion</u>	<u>Percent Change in Manufacturing Jobs, 1970-75</u>	<u>Percent of Region's Manufacturing Jobs, 1975</u>
Core	-7	45
North Shore	-8	14
North	28	7
Northwest	25	6
West	-7	10
Southwest	9	10
South Shore	-18	7

Source: United States Census, 1970; CTPS Interim Socioeconomic Forecasts, 1977

¹Proximity to employment does not automatically mean access, however. Noneconomic barriers to employment such as racial discrimination may create a dual job market where certain opportunities are effectively closed off to groups of lower-income people.

In conjunction with transportation planning, MAPC has prepared a set of employment projections for the period 1970-85. These projections generally coincide with the trends found during the 1970-75 period. According to these projections, the Core, North Shore, and South Shore will continue to lose manufacturing jobs, and the North, Northwest, and Southwest will continue to gain. The West will turn its 1970-75 loss into a 3 percent gain (See Table 3.3).

Trends show that middle- and upper-income groups tend to move out from the Core subregion, while lower income residents tend to stay in the Core subregion. Thus, jobs that the lower income are most likely to engage in are slowly moving away from their homes. While some unemployed are likely to retrain for other positions, many will find themselves without alternative employment opportunities within easy proximity of their homes.¹ Attempting to relocate to areas where they might again gain employment, they will face the high prices of housing documented in Chapter 1.

In setting its goals for assisted housing for each community in the region, MAPC has given primary consideration to the close link between employment opportunities and housing by incorporating two measures of employment in its allocation formula (See Chapter 4). MAPC has also identified for communities the number of lower income families that could be expected to reside based upon the results of this allocation formula.

Finally, extensive outreach efforts will be undertaken jointly with a smaller number of communities to provide lower income families with housing opportunities in closer proximity to expanding job opportunities. Only by linking these two vital aspects of life will a Housing Opportunity Plan achieve its full potential.

Fiscal Capacity

Fiscal Impacts of Development

The development of any housing--subsidized or unsubsidized--has a fiscal impact on the municipality in which it is built. New housing adds both to municipal costs and municipal revenues. Costs are accrued through additional requirements for utilities, streets, roads, and schoolrooms that may accompany the development of new housing.² Revenue is also increased directly through taxation on the new property and indirectly through automobile excise taxes, municipal fees, and any

¹Such retraining programs are of particular importance in light of the overall decrease of manufacturing employment within the region.

²Where possible, new construction should take advantage of existing sewer infrastructures. Where infrastructures are not in place, housing development can be accommodated by the use of on site systems or package treatment plants which would best serve groups of apartments such as those in cluster developments. MAPC will work closely with communities in exploring methods for meeting their housing goals with minimum cost resulting from additional sewerage requirements.

Table 3.3: SUBREGIONAL EMPLOYMENT--ACTUAL & PROJECTED

SUBREGION	1970		1975		1980 (P)		1985 (P)		PERCENT CHANGE 1970-75		PERCENT CHANGE 1970-85 (P)	
	TOTAL	MANU.	TOTAL	MANU.	TOTAL	MANU.	TOTAL	MANU.	TOTAL	MANU.	TOTAL	MANU.
Core	618,399	141,058	815,966	131,071	880,200	123,670	922,150	115,150	31.9	-7.1	49.1	-18.4
North Shore	101,148	44,433	130,338	41,058	139,620	39,890	151,060	39,465	28.9	-7.6	49.3	-11.2
North	49,457	16,567	70,561	21,148	80,300	20,025	89,350	18,925	42.7	27.7	80.7	14.2
Northwest	24,383	14,680	41,697	18,278	45,640	18,310	50,860	18,195	71.0	24.5	108.6	23.9
West	71,415	29,201	95,559	27,297	112,550	28,750	125,300	29,950	33.8	-6.5	75.5	2.6
Southwest	62,338	26,267	89,757	28,519	200,940	28,990	113,080	30,160	44.0	8.6	81.4	14.8
South Shore	74,530	25,668	98,235	21,044	107,270	22,497	115,795	23,257	31.8	-18.0	55.4	-9.4
REGION	1,001,670	297,874	1,342,113	288,415	1,566,520	282,132	1,567,595	275,102	34.0	-3.2	56.5	-7.6

Source: United States Census, 1970

CTPS Interim Socioeconomic Forecasts, July, 1977

(P): Projected

commercial development arising to meet the demands of increased housing. The net fiscal impact is measured by balancing these two factors against each other.

The difference between subsidized and unsubsidized housing in the demands they make upon the fiscal base is not likely to be great. Housing developed by private developers with subsidies attached or rental assistance programs using the existing stock are taxed at the same rate as unsubsidized developments. An MAPC study on "Problems of the Local Property Tax" indicated that some types of subsidized housing frequently excluded on the grounds that they do not "pay their own way" have actually resulted in a net fiscal benefit to some communities.² Only units developed under the Low-Rent Public Housing program at the federal level and the Chapter 667 and 705 programs at the state level pay less than the full tax rate. These programs, however, do contribute a payment in lieu of taxes each year to the community. Thus, a blanket refusal to accept subsidized housing because of fears that it will greatly inflate costs to the community is not ordinarily justified.

Incorporation of Fiscal Capacity in the AHOP

Since it is uncertain initially whether the net fiscal impact of any development will be positive or negative, it is useful to incorporate a measure of a community's fiscal capacity into its goals for assisted units. MAPC has done this in two ways:

- 1) By devising a formula based on the proportion of a community's non-school revenues to the region's total for non-school revenues and incorporating this formula into the allocation scheme described in Chapter 4; and
- 2) By analyzing each community's fiscal capacity based upon two commonly accepted measures: equalized assessed valuation (per capita) and equalized tax rate.

Relative Fiscal Capacity of Communities

Equalized valuation is a measure of the total taxable wealth of a community. Equalized tax rate is the tax per \$1000 of taxable wealth assessed at 100 percent of value. A high equalized valuation and low equalized tax rate indicates a healthy fiscal base with some capacity to provide additional services. Conversely, a low equalized valuation and high equalized tax rate indicates an overburdened tax base with little capacity to provide increased services.

¹Metropolitan Area Planning Council, Impacts of Housing Development on Community and Region, September, 1977

²Metropolitan Area Planning Council, Developing Housing Strategies For the Metropolitan Boston Region: Problems of the Local Property Tax, June, 1977. Multi-unit buildings are unlikely to have large numbers of school-age children, which can be one of the major sources of a development's fiscal cost to a community.

Table 3.4 indicates the average equalized valuations for the seven MAPC subregions and the distribution of tax rates among the communities:

Table 3.4: Average Equalized Valuations For Subregions & Distribution of Equalized Tax Rates

Subregion	Average Per Capita Equalized Valuation ¹	Number of Communities with Equalized Tax Rates Between		
		<u>\$1-\$29.99⁽¹⁾</u>	<u>\$30-49.99⁽¹⁾</u>	<u>\$50-⁽¹⁾</u>
Core	\$11,812	1	7	11
North Shore	16,386	7	9	2
North	15,410	1	7	0
Northwest	19,344	5	5	0
West	16,562	1	12	0
Southwest	15,545	1	17	0
South Shore	14,956	<u>0</u>	<u>12</u>	<u>3</u>
REGION	-	16 (16%)	69 (68%)	16 (16%)

Source: Massachusetts Taxpayers' Foundation, Municipal Financial Data 1979 with additional calculations by MAPC Economics Department.

(1) Per \$1,000 assessed equalized valuation.

This table indicates that the Core area stands apart from the rest of the region with the least amount of taxable wealth (average-\$11,812) and the highest proportion of communities with tax rates in excess of \$50 per \$1,000 assessed equalized valuation. On the other hand, the Northwest area has the highest average per capita equalized valuation (\$19,344) and proportion of its communities with tax rates below \$29.99. The majority of communities have equalized tax rates in the range of \$30-\$49.99, which indicates a sound fiscal base to absorb the cost of any additional services within the region that might result from meeting the needs for housing, subsidized, and unsubsidized.

This analysis indicates that, as with opportunities for employment, the Core is least able to support additional development. The other subregions, where employment opportunities are expanding, demonstrate relatively lower current tax rates and higher amounts of taxable property. It is appropriate, therefore, that increased housing opportunities be provided for low- and moderate-income households outside the Core area.

¹These figures were derived by averaging the Per Capita Equalized Valuation for all communities within the subregion.

Barriers to Implementation: Zoning and Other Land Use Controls

Introduction

The most prominent barrier to implementing a plan to expand housing opportunities for lower-income households is the discrepancy between the cost of adequate housing and the ability of these households to pay for such housing. This barrier may be lowered substantially through federal and state funding for publicly owned low-rent housing, privately owned subsidized housing and rental assistance programs for new, rehabilitated or existing units.

However, use of any of these programs, particularly in suburban and exurban communities, is contingent on zoning ordinances and subdivision requirements allowing for a diverse range of residential land uses. Without such flexibility, these regulations may become "exclusionary", serving as a serious impediment to the expansion of housing opportunities for lower-income households.

The original intent of land use regulations to promote the general health, safety, and welfare may be lost should standards become excessive, hindering movement within the region by families of diverse incomes. The following sections of this chapter present several common features of zoning ordinances and subdivision requirements that result in such exclusion.

Zoning: Prohibition or Restriction of Multi-unit Dwellings, Minimum Lot Sizes, and Maximum Density Requirements

For a number of reasons, multi-unit dwellings are the easiest for low-income families to afford. A 1975 study of housing costs found that the national average rent for a typical unfurnished four-room garden apartment of approximately nine hundred square feet was \$215 per month. This may be compared with an approximate \$500 per month cost of the average new single-family home priced at \$50,000 and containing 1638 sq. feet.¹

Aside from actual cost considerations, multi-unit dwellings tend to be rental units, which are most likely to shelter lower-income households. Low-income residents seldom can afford downpayments and closing costs associated with home ownership. Rental units allow them to avoid these front-end costs. The interest subsidies of the Federal Housing Administration (FHA), Veteran Administration (VA), and Farmers Home Administration (FmHA) have generally not been able to subsidize incomes of lower-income households enough to meet homeownership costs.²

¹ Seidel, Stephen R., Housing Costs and Government Regulations, (The Center For Urban Research, Rutgers, NJ.), 1978, p. 170.

² See "Private Housing Market Trends" in Chapter One.

Also, major federal and state housing programs providing long-term deep assistance for lower-income households have been, by and large, rental subsidies

Communities prohibiting or restricting the supply of rental units through multi-unit dwellings sharply limit the effectiveness of programs promoting housing opportunities. A common problem among suburban housing authorities is the unavailability of rental units where subsidy certificates can be used. Under these circumstances, certificates are often returned to the housing authority, not for lack of eligible recipient demand, but for inadequate supply of units. Of the 101 jurisdictions in the MAPC region, 37 communities allow multi-unit dwellings by right, 26 by permit, and 24 have absolute prohibitions on them.¹

Designating areas by minimum lot size and maximum density is another common zoning measure that effectively prohibits low-income units. Such a practice restricts both the number and type of dwelling units that can be built within a community, and raises land costs, and thus market values and sales prices. An increase in lot size also has significant effects on the cost of the lot, particularly in the lower range of lots sizes.² This factor is likely to raise these units just beyond the margin of affordability for moderate-income households. When combined with excessive subdivision requirements, the cost effect of such zoning become especially prohibitive, as the greater amount of land to be developed is multiplied by the higher cost of improvements.

Zoning Profile of the MAPC Region

The zoning patterns of the region's communities and subareas are summarized in Figure 3-A and Tables 3.4 and 3.5. Eighty percent of the region's land is zoned for residential purposes. Under this measure, subregions vary only slightly. The North Shore subregion has the lowest proportion of residentially zoned land at 77 percent. The Core subregion has the greatest proportion of land zoned in the R-4 category--the only one for most purposes that will accommodate multi-unit dwellings.³ Over 40 percent of its total acreage falls within this category, representing 57 percent of the total multi-unit zoning in the region. At the other end of the spectrum are the Northwest and Southwest subregions, with 2 percent or less of their total acreage zoned for multifamily. Conversely, the Core subregion has none of its acreage zoned for one acre or more, whereas the Northwest and Southwest subregions show 39 percent and 20 percent respectively.

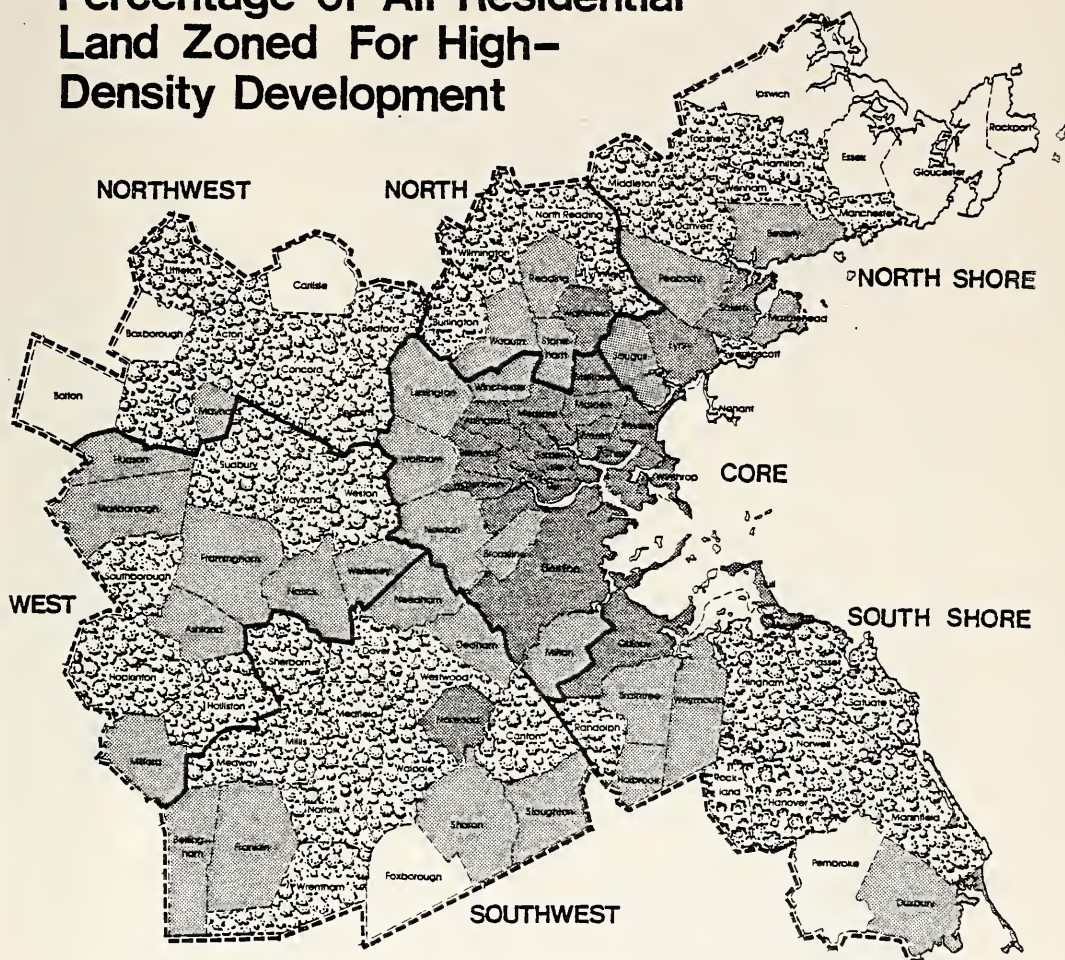
¹1976 survey of zoning ordinances prepared by MAPC Land Use Department; updated to 1979 where information was available in Community Information Questionnaires (See Table 3.A.7 in Appendix B).

²Seidel, Stephen R., *op. cit.*, p. 174: "At least one commentator has noted...that the cost curve rises most sharply in the smaller lot-size ranges-between 6,000 and 8,000 sq. feet--which is the range within which exclusionary impact is most likely to be felt." Seidel also suggests that large lot zoning raises the cost of smaller lots by creating a shortage of these units.

³R-4: Maximum density allowed: Five or more dwellings units per acre.
Minimum lot size allowed: 8,712 sq. ft. per acre.

Figure 3-A

Percentage of All Residential Land Zoned For High-Density Development



LEGEND

- Information not available
- 0 percent
- 1-49 percent
- 50-100 percent

High-Density: Five or more dwelling units per acre.



4 2 0 4 8 12
Scale in Miles

SOURCE: MAPC Areawide Wastewater Management Study

Table 3.5: Existing Zoning Acreage (1976)

Subregion	Total Acreage	% of Reg. Acre.	Total Residential Acreage	% of Tot. Acre.	% of Tot. Acre.		% of Tot. Acre.	% of Tot. Acre.		Non-Residential	% of Tot. Acre.
					R-4	R-3		R-2	R-1		
Core (1)	85,584	11%	67,653	79%	29,712	22,798	15,143	18%	0	17,931	21%
North Shore (2)	93,147	12	71,272	77	7,668	19,003	33,205	36	11,396	21,875	23
North	58,168	7	46,643	80	4,497	20,119	17,617	30	4,410	11,525	20
Northwest (3)	74,350	10	58,793	79	252	11,367	18,001	24	29,173	15,557	21
West	150,197	19	122,549	82	7,207	24,083	70,757	47	20,502	27,648	18
Southwest (4)	179,290	23	150,466	84	4,369	27,486	82,439	46	36,172	28,824	16
South Shore (5)	139,968	18	108,698	78	6,681	41,471	58,660	42	1,886	31,270	22
REGION	780,704	100%	626,074	80%	60,386	166,327	295,822	38%	103,539	154,630	20%

Source: Metropolitan Area Planning Council, Areawide Waste Treatment Management Plan, 1978.

Residential	Maximum Density		Minimum Lot Size	
	R-1	R-2	R-3	R-4
	Less than one dwelling unit per acre	One to 1.9 dwelling units per acre	Two to 4.9 dwelling units per acre	Five or more dwelling units per acre
(1)	Excludes Boston			
(2)	Excludes Essex, Gloucester, Ipswich, Rockport			
(3)	Excludes Bolton, Boxborough, Carlisle			
(4)	Excludes Sherborn			
(5)	Excludes Pembroke			

Table 3.6: Percentage of Residential Land Zoned For Different Densities, by Subregion

	Region	Core (1)	North Shore (2)	North	Northwest (3)	West	Southwest (4)	South Shore (5)
Percent Share of Residential Acreage Within Region	626,074	11%	12%	7%	10%	19%	23%	18%
Zoning Categories								
R-4	60,386	49	13	7	0	12	7	11
R-3	166,327	14	11	12	7	14	17	25
R-2	295,822	5	11	6	6	24	28	20
R-1	103,539	0	11	4	28	20	35	2

Source: Metropolitan Area Planning Council, Areawide Waste Treatment Management Plan, 1978.

- (1) Excludes Boston
- (2) Excludes Essex, Gloucester, Rockport, Ipswich
- (3) Excludes Bolton, Boxborough, Carlisle
- (4) Excludes Sherborn
- (5) Excludes Pembroke

Residential

- R-1 Maximum Density
- R-2 Less than one dwelling unit per acre
- R-3 One to 1.9 dwelling units per acre
- R-4 Two to 4.9 dwelling units per acre
- Five for more dwelling units per acre

Land Availability

Tables 3.5 and 3.6 do not present zoning in terms of its impact on the future development of low- and moderate-income housing opportunities. In urban areas already densely developed, changes in zoning ordinances are likely to have less impact on the expansion of such opportunities than a rehabilitation program or the provision of rental assistance in existing housing. Where land is available for development, however, zoning and subdivision regulations will have a direct effect on housing opportunity.

In MAPC's Metropolitan Boston Regional Housing Strategy, the council projected a need of over 362,000 new units for the region for the period from 1975 to 2000.¹ New construction will be necessary to meet a substantial proportion of this need. According to policies adopted by the MAPC in both the housing and land use elements previously submitted to HUD, this effort should include meeting the housing needs of low- and moderate-income households.² Where this housing is built will be determined largely by the location of available land within the region. Table 3.7 indicates that the bulk of this land is located in the outlying communities of the MAPC region. The Core subregion shows only 20 percent of its land available for development, while the other subregions range from 48 percent (North) to 66 percent (Southwest and Northwest). A more detailed study of 47 of the outlying, unsewered communities indicates that they contain over 64 percent of the land available for development in the entire MAPC region.³ These communities, therefore, represent a crucial part of the region's effort to meet housing needs for the region over the next 25 years.

Generally, the zoning practices regulating land still available for development present a pessimistic outlook for the expansion of housing opportunities in the MAPC region. Table 3.7 indicates that those communities with the most land available are the least likely to have land zoned at densities permitting construction of multi-unit dwellings.

¹Metropolitan Area Planning Council, Metropolitan Boston Regional Housing Strategy (Boston: The Council, 1978), Appendix One.

²Ibid, p. 5; Metropolitan Area Planning Council, Policies For Land Use In Metropolitan Boston, 1978, p. 1-22

³Metropolitan Area Planning Council, 208 Water Quality Project data.

Table 3.7: Land Available and High Density Zoning

<u>Subregion</u>	<u>% Land Available</u>	<u>% High Density Zoning</u>
Northwest	66	0
Southwest	66	3
West	57	5
South Shore	56	1
North Shore	53	8
North	58	8
Core	20	35

Source: McConnell Air Photo Survey, 1972
MAPC 208 Water Quality Project data.

The study of the 47 communities previously cited indicates that, while they contain approximately 64 percent of available land in the region, none of this land is zoned for high density, and over 69 percent of it is zoned for lots greater than one acre.

These patterns strongly suggest that existing zoning ordinances are barriers to the expansion of housing opportunities for lower income households in the MAPC region. In its implementation section, the AHOP provides measures to overcome these barriers. MAPC has adopted as one of its primary objectives "the provision of housing opportunities for all household sizes and people of diverse income levels and cultural background in outlying villages and rural centers as well as more developed suburban and urban locations."¹ The Council believes that this objective need not conflict with goals to conserve valuable environment resources. Under the AHOP, MAPC plans to expand ongoing efforts to assist local officials in implementing land use measures that allow both objectives to be met.

Subdivision Requirements

Subdivision requirements include the regulation of sewer, drainage, and water lines, street size, curbs, and gutters. In a study of the effect of government regulations upon housing costs, Stephen Seidel has noted: "The desire to insure high-quality subdivisions is sometimes synonymous, in effect if not always in intent, with the exclusion of those people who can afford only low-cost housing...The level of public improvements required must be scrutinized to determine whether or not the regulations are actually designed to erect an economic barrier to keep out the poor and, increasingly, those with a moderate income as well."² Some of the

¹Metropolitan Area Planning Council, Policies For Land Use in Metropolitan Boston, (Boston: The Council, 1978) pp.1-7.

² Seidel, op. cit., p. 125

subdivision practices that appear to be excessive include pavement widths and frontage sizes, requirements for granite curbing, and reliance on water pipes when natural drainage would suffice. Over ten years ago, the Kaiser Commission noted that "an increase of one foot in street pavement width would add anywhere from \$6 to \$15 to the cost per lot." Raising the frontage of a 60' X 125" lot to 70 feet would add 15 percent to the cost of improvements.¹ A decade later, these cost implications are even greater. MAPC's manual on Non-Zoning Land-Use Protection Techniques notes that in 1978 granite curbs cost \$9.40 per foot, versus \$1.40 per foot for 'Cape Cod' asphalt beams. The same manual notes that not only are natural drainage techniques cheaper than building water pipes, but in many instances are ecologically superior.²

The Council urges local planning boards to examine their requirements for evidence of such exclusionary standards, and readjust them to allow for diversity in housing costs in their communities while maintaining minimum standards for safety and health. One of the implementation techniques noted in Chapter 5 is the provision of technical assistance to communities in readjusting their zoning and subdivision requirements. Manuals such as Non-Zoning Land-Use Protection Techniques and Growth Management Techniques,³ both of which include model ordinances, are efforts this areawide planning agency has initiated to serve this purpose.

Innovative Solutions

Innovative zoning and land-use measures have been designed to allow communities to develop diverse housing stocks without sacrificing the benefits of open space and natural environments originally protected through low-density zoning. Cluster and planned-use developments are two such measures. These developments, instituted by zoning ordinances, allow the developer a higher density on a given piece of land in exchange for maintaining the rest of the land for open space. This can result in a development which includes some multi-unit structures on land zoned for lower densities, and which fits naturally into the surrounding environment. While such developments do not automatically result in housing opportunities for lower-income households, they are better suited to use the housing subsidy programs.⁴ Twenty-five communities in the MAPC region allowed such developments in their zoning ordinances in 1977, and it is likely that more have adopted these ordinances since then.

¹President's Committee on Urban Housing, Technical Studies (Washington, Government Printing Office, 1968), Vol. 11, p. 108

²Metropolitan Area Planning Council, Non-Zoning Land Use Protection Techniques, (Boston: The Council, 1978), p.6

³Metropolitan Area Planning Council, Growth Management Techniques, (Boston: The Council, 1978).

⁴As with conventionally-zoned developments, the key to the impact upon housing price and subsequent availability to lower-income households is the maximum density allowed by the ordinance.

Accessory apartments also create additional low-cost units with minimal impact to the environment. These are units within single-family homes that are set off as separate apartments through minor modifications to the existing structure. They not only add housing units to the market, but allow for a more efficient use of large houses built for families whose children have left the household. MAPC has published a manual on accessory apartments in the MAPC region.¹

In several suburban communities in the MAPC region, local incentives have been developed encouraging the construction of lower income housing units, particularly for family households. Among these are requirements that developers reserve a number of units in each development for occupancy by lower-income families in exchange for either the permit necessary to develop a particular piece of land or a zoning variance needed for development. The major advantage of such an approach is that it ties in creation of low-rent units with the growth rate of conventional housing desired by the community. It also creates mixed-income housing, which integrates lower income and market rate units. The state Massachusetts Housing Finance Agency (MHFA) has been financing such projects successfully for over eight years, proving that a mix of income types can work. MAPC will encourage agreements between private developers and local officials to increase housing opportunities for lower-income households and, at the same time support the use of mixed-income developments to integrate such households within the community. These solutions, and others as they are developed, will continue to be incorporated into the technical assistance and publications offered by the Council. (See Chapter 5)

¹Metropolitan Area Planning Council, Accessory Apartments Within the MAPC Region, (Boston: The Council, 1978)

CHAPTER 4

Goals For Distributing Housing Assistance¹

Introduction

The primary purpose of this Areawide Housing Opportunity Plan (AHOP) is to provide the Department of Housing and Urban Development with guidelines for distributing housing assistance throughout the region. These guidelines delineate ways to provide low-income households with a broader geographical choice of housing opportunities outside areas and jurisdictions containing undue concentrations of low-income or minority households.² In this chapter, MAPC describes the methodology used in setting goals for communities, taking into account patterns of federal funding, current needs, population and employment trends, fiscal capacity, availability of land and rental units, and special factors affecting particular communities. The annual and three-year goals for each subregion are then presented in Table 4.3, with accompanying figures for individual communities in the Appendix to this volume. Finally, the implications of past funding patterns for meeting the goals are examined and recommendations made for future funding allocations in the MAPC region.

Federal Funds for Housing Assistance, 1977 to 1979

Developing goals as a basis for future housing allocations is essential for a regional housing strategy. To formulate goals, it is necessary to examine previous funding patterns and ascertain future funding levels. A summary of federally assisted housing units provided to the MAPC region over the past three years is given in Table 4.1 and graphically displayed in Figure 4-A.

Several trends become evident from examining recent funding patterns. Overall housing assistance levels have decreased steadily since 1977. This decrease in the number of additional units provided annually is due largely to increases in housing costs rather than decreasing funding levels. Since

¹ This Chapter addresses HUD requirements addressed in Sections 891.503(b), 891.503(c) and 891.503(d) of the Federal Register, as well as Sections 891.505(a)(7) and 891.505(a)(11).

² In achieving its objective of providing greater choice of housing for lower income persons under the Areawide Housing Opportunity Plan, the Council also supports the complementary objective of achieving economically integrated communities. Urban neighborhoods, particularly those where lower income households are involuntarily displaced as a result of publicly encouraged revitalization efforts, may also be appropriate locations for assisted housing so as to foster housing opportunities and choice for these disenfranchised households.

Table 4.1: Program Allocations for Fiscal Years 1977-1979

Program	Fiscal Year 1977			Fiscal Year 1978			Fiscal Year 1979 ¹		
	Elderly	Family	Total	Elderly	Family	Total	Elderly	Family	Total
Section 8 New Construction/Rehab	2,950	1,982	4,932	2,205	2,232	4,437	1,583	218	1,801
Low Rent Public Housing	600	380	980	276	331	607	886	115	1,001
Section 8 Existing/Moderate Rehab. ²	179	311	490	317	557	874	169	2,009	2,178
All Programs	3,729	2,673	6,402	2,798	3,120	5,918	2,638	2,342	4,980

Source: Work Sheets from the Boston HUD Area Office

1 1979 Allocations are estimates based on the FY'79 Assisted Housing Allocation Plan. Totals may be slightly understated due to additional allocations which may come late in Fiscal Year 1979.

2 The Section 8 Moderate Rehabilitation Program was not developed until FY'79.

1977, allowable fair-market rents under the Section 8 program have increased more than 20 percent. Construction-cost increases in the Low Rent Public Housing Program have been only slightly less precipitous.¹

Increasing costs are also responsible for the emergence of another trend--the heavy reliance on Existing Section 8 as a subsidy mechanism. Because annual per-unit costs for Existing Section 8 are roughly half as much as Section 8 New Construction or Substantial Rehabilitation, HUD has attempted to maintain the absolute number of newly assisted units by shifting funds into the Existing Section 8 Program.² In 1977, only 9 percent of all Section 8 units in the MAPC region were in the Existing Program. By 1978, this figure had increased to 16 percent and, for fiscal year 1979, existing units accounted for more than 54 percent of all Section 8 units.

It is critical to note the relative family and elderly mix between programs and how this mix has changed over time. New construction and substantial rehabilitation, both in the Section 8 and Low Rent Public Housing Programs, have increasingly been allotted to meet elderly needs, with the Section 8 Existing Program becoming the near-exclusive housing assistance mechanism for meeting family needs. This trend is especially evident in comparing fiscal year 1979 allocations to those for previous years (Table 4.1 and Figure 4-A). During 1977 and 1978, about 64 percent of all Section 8 Existing units went to family tenants. In 1979, this figure soared to 92 percent. Similarly, in 1977 and 1978, families accounted for 40 percent and 51 percent of all new construction and substantially rehabilitated units. In 1979, this figure plummeted to 12 percent. While cost increases explain the other trends in allocations cited above, the increasing shift of new construction to elderly projects can be explained only by examining the allocations procedure itself. This is discussed in detail below.

Also important in analyzing funding patterns is the difference between the supply and demand for housing assistance. Table 4.2 summarizes the shortfall of current federal housing assistance programs in comparison to requested levels of assistance. From this data it is clear that significant shortfalls between housing assistance applications and resources occur in all program for both elderly and families. Indeed, a 100 percent increase in the funding level of both the Section 8 and Public Housing programs would still not meet even this year's demand, as measured by actual applications. The percentage of applications that can be expected from analyzing data in Table 4.1, the relative shortfall by program and household type varies

¹ Based on 1977 Prototype Cost Limits for Low Income Housing and discussions with the Boston Area Office Economist.

² Based on December 1978 discussions with Boston HUD Area Office economist, estimated per unit annual costs for this region were:

\$2,950 Existing
 \$5,570 New Construction
 \$5,700 Substantial Rehabilitation

Figure 4-A

Program Allocations for Fiscal Years 1977-79

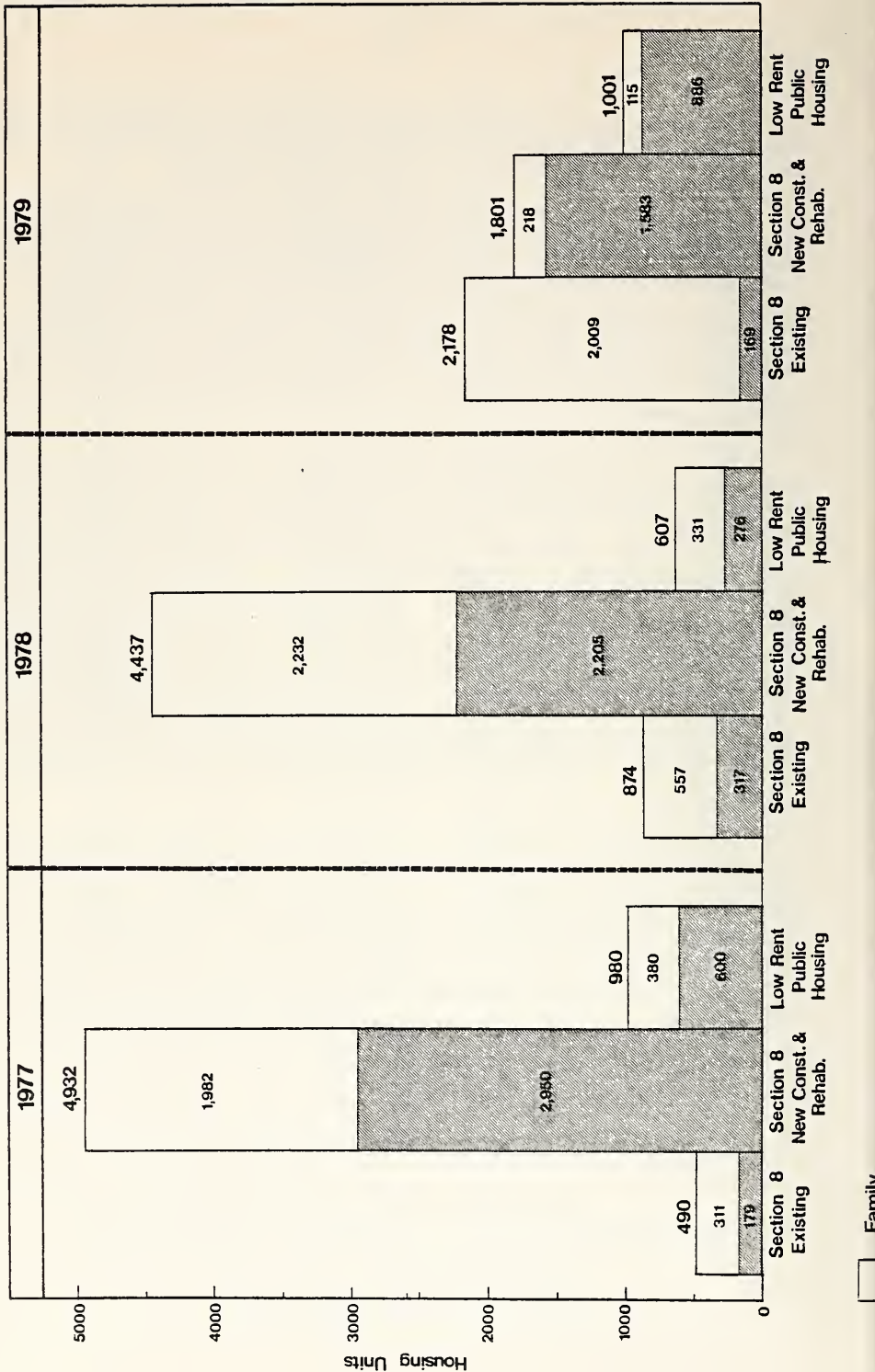


Table 4.2: Recent History of Funds Availability

	Applied For ¹		Available ²		Shortfall	
	Elderly	Family	Total	Elderly	Family	Total
New Construction/ Rehabilitation LRPH and Sect. 8	4,578	2,821	7,399	2,469	333	2,802
Existing and Moderate Rehabilitation ³	2,971	4,037	7,008	169	2,009	2,178
All Programs	7,549	6,858	14,407	2,638	2,342	4,980
				2,109	2,488	4,597
				2,802	2,028	4,830
				4,911	4,516	9,427

Source: Boston HUD Area Office worksheets, MAPC A-95 review summary.

- 1 Excludes Section 8 New Construction applications forwarded directly to HUD. Also excludes projects not meeting minimum MHFA feasibility standards.
- 2 Some interpolation has been made for Amendment funds not targeted to either Elderly or Families.
- 3 Existing Section 8 applications are based on FY'78 applications.

enormously. While only 12 percent of all requests for family new construction and rehabilitation projects can expect to be funded this year, almost 54 percent of all elderly requests in these programs can expect funding. Virtually the opposite is true with the Section 8 Existing and Moderate Rehabilitation Programs. Only about 6 percent of all elderly Existing and Moderate Rehabilitation requests will receive funding while almost half of all family requests in these programs will be funded.

Accurately predicting future funding levels is difficult; nevertheless an educated guess can be made about the level of housing assistance likely to come to the region during the next three years. During the federal fiscal years 1977-79 a total of 14,600 units was allocated to the MAPC region, representing about 7.3 percent of 1978 housing need. Thus, on an annual basis, approximately 2.4 percent of the region's housing need has been met each year. Recognizing the prevailing trend of fiscal austerity found at all levels of government as well as rapidly escalating prices for housing, it appears likely that housing assistance during the next three years will at best equal and most likely fall short of the recent levels of housing assistance provided in the region. Even assuming funding continues at roughly the same level, this will amount to a net 20 percent decrease in housing allocations in terms of constant dollars if costs continue to increase at the same rates. Under these conditions, the region can expect to meet between 5.8 and 7.3 percent of its housing needs during the next three years.

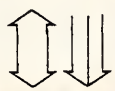
The means for meeting housing needs over the next three years is largely a function of the allocations process itself. Figure 4-B illustrates the housing allocations process as it currently exists. Funding levels and program mix are almost exclusively determined at the national level by Congress and the HUD Central Office. The Boston HUD Area Office has only minimal input into this process. The primary control which exists in both the Massachusetts Housing Finance Agency (MHFA) and the Boston Area Office is the relative mix of elderly and families by program. As Figure 4-B indicates, MHFA receives its funding not from the Boston Area Office but from the Central Office in Washington. Thus, MHFA can independently determine the elderly and family mix of the programs. In recent years this has meant an increasing emphasis on elderly projects regardless of state, regional, or local housing goals.¹ While this trend may in part reflect

¹ MHFA Commitments, 1969-78, By Household Type

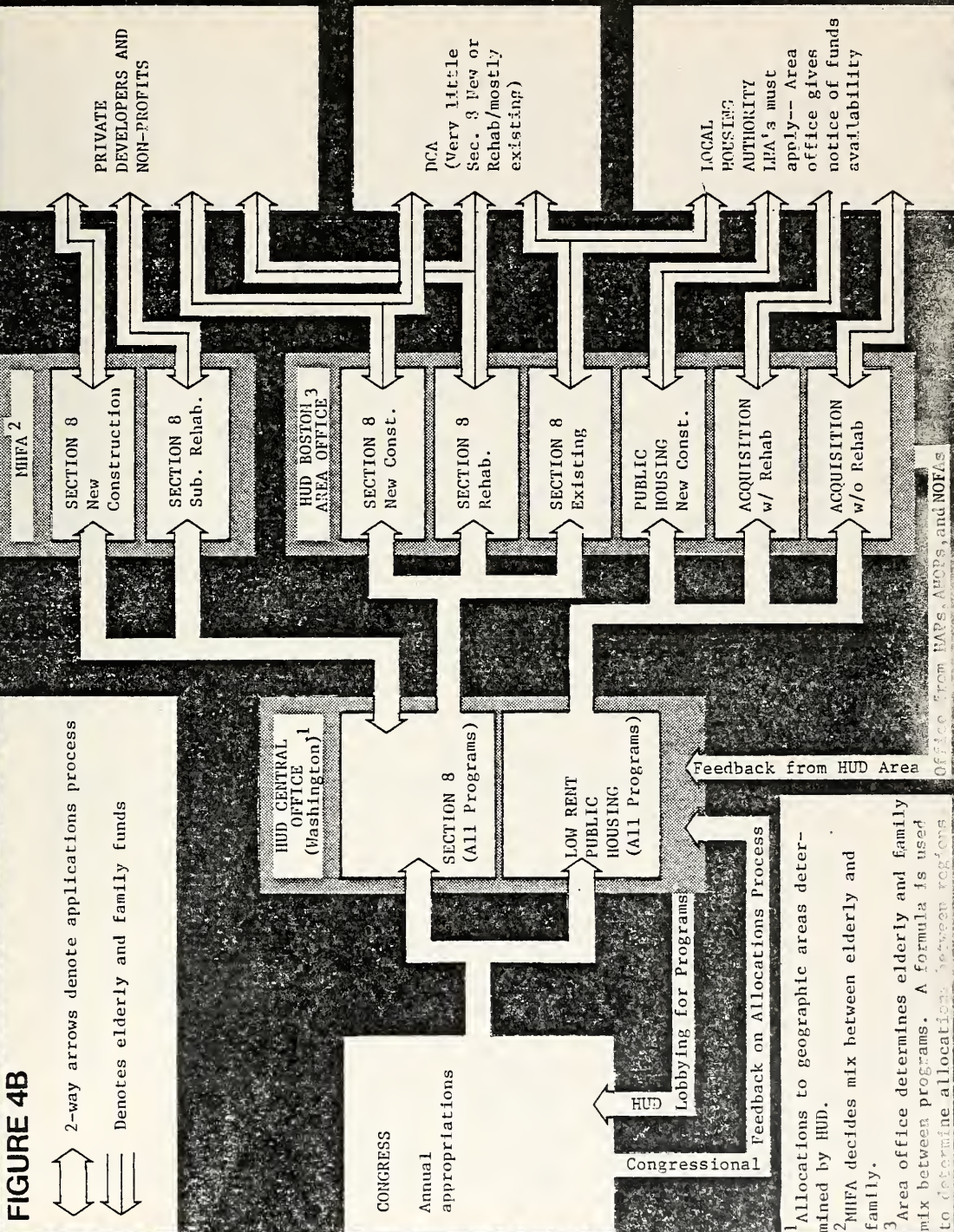
<u>MAPC Region</u>	<u>Total Units</u>	<u>Elderly</u>	<u>Small Family</u>	<u>Large Family</u>
1970-72	7769 (100%)	2189 (28%)	4895 (63%)	685 (9%)
1973-78	6115 (100%)	3529 (58%)	2046 (33%)	540 (9%)

The HUD Area Office maintains that because of MHFA's increasing emphasis on elderly housing, it has been forced to make up the "family deficit" by relying increasingly on the Existing Section 8 program to meet family needs.

FIGURE 4B



2-way arrows denote applications process
 Denotes elderly and family funds



¹ Allocations to geographic areas determined by HUD.
² MIHA decides mix between elderly and family.
³ Area office determines elderly and family mix between programs. A formula is used to determine allocations between regions.

the types of applications submitted, MHFA may have substantial influence over the make-up of this applicant pool through its administrative authority to create incentives for family developments. It has begun to move in this direction by offering bonus points to developments that include family units, but the response to a recent request for applications indicates that greater incentives need to be offered.¹ During fiscal year 1979, almost all Section 8 New Construction and Substantial Rehabilitation monies for the state were allotted to MHFA. This reliance by HUD upon MHFA to distribute a significant portion of the region's housing assistance means that MHFA's future actions will have a great impact upon the success of this plan.

Housing Assistance Goals

Taking into account expected levels of funding discussed above, housing assistance goals for the next three years have been calculated for all communities. Goals have been formulated to further the objective of providing housing opportunities in areas of low concentration and to provide for maximum community input and program flexibility. These goals should be viewed as minimums, not maximums, by communities. Funding for additional units will be encouraged where they will further the objective of the AHOP.

To establish individual community goals MAPC applied the HUD Housing Assistance Plan guideline that long-term, deep subsidy goals for the next three years should meet between 7 percent and 15 percent of total remaining needs.² To maximize program flexibility, goals for all communities were initially set at 15 percent of needs. Communities then reviewed these preliminary numbers and evaluated the feasibility of these goals for their community. Although 15 percent was appropriate for most communities, several cities and towns found the numbers inappropriate or inconsistent with local housing objectives. Modifications were allowed where they were essential to:

- 1) Maintain consistency with local housing assistance plans and to further the AHOP's stated objective of spatial deconcentration. For example, impacted communities (those with subsidized units exceeding 10 percent of all housing units³) were allowed to set goals anywhere between 7 percent and 15 percent of need.

¹ Distribution of MHFA Preliminary Proposals by Regional Planning Districts, Revised 5/11/79

	<u>Total Units</u>	<u>E</u>	<u>SF</u>	<u>LF</u>	<u>Household Type Unspecified</u>
MAPC Region	6507	3811	2048	354	294
		(59%)	(31%)	(5%)	(5%)

² Excluded from this category are one-time rehabilitation loans and grants that do not create additional units of assisted housing.

³ See Figure 2-A

Table 4.3.: Annual and Three Year Percentage Goals for Housing Assistance

Subregion	Totals		Household Type			Tenure		Housing Type		Percentage of Regional Need
	Number of Units	Percentage of Regional Goals	Elderly	Family	Large Family	Owner	Renter	Existing	New/Rehab	
Core	13,991	.549	.41	.49	.10	.29	.71	.50	.50	.65
North Shore	4,212	.165	.50	.38	.12	.40	.60	.23	.77	.13
North	1,136	.045	.41	.47	.12	.62	.38	.19	.81	.03
Northwest	505	.020	.36	.48	.16	.65	.35	.24	.76	.02
West	2,105	.083	.43	.46	.11	.53	.47	.27	.73	.05
Southwest	1,688	.066	.37	.46	.17	.61	.39	.10	.90	.05
South Shore	1,842	.072	.36	.47	.17	.59	.41	.26	.74	.07
MAPC TOTAL	25,479	1.000	.42	.46	.12	.37	.63	.31	.69	1.00
Impacted Communities (8) (Over 10% Sub-sized Units) ¹	9,636	.38	.42	.46	.12	.23	.77	.50	.50	.51
Non-Impacted (93) Communities (Less than 10% Sub-sized) ²	15,843	.62	.42	.47	.11	.51	.49	.24	.76	.49

1 This category is comprised of eight communities: Boston, Cambridge, Chelsea, Lynn, Malden, Milford Quincy, Salem.

2 93 remaining communities in the MAPC region.

- 2) Prevent communities from being penalized for receiving special allocations. Special allocations were not included in the recipient community's three-year goals. Neighborhood Strategy Area recipients and those communities receiving Urban Development Action Grants were the primary beneficiaries of this provision.
- 3) Ameliorate disparities caused by housing assistance funding already committed to a community. Where the three year goals were less than the number of units committed to an ongoing development, the goals were increased to accommodate the development. If necessary, further adjustments will be made, particularly during the first year that the Plan is in effect, to avoid disruption of any projects to which a commitment has been made prior to the date that the Plan is approved by HUD.

In addition to reviewing preliminary goals numbers, all communities were given the opportunity to determine the types of housing to be provided. Communities were also allowed complete discretion in setting one-year goals. Annual and three-year percentage goals for all communities over 25,000 are displayed in Table 4.A.1 found in Appendix B of Volume 2. Numerical goals for all communities can be found in Table 4.A.2 of the Appendix.

The net effect of the goals process employed by MAPC is presented in Table 4.3 which compares subregional goals with subregional needs. While housing needs in Core communities account for 64 percent of all regional need, these communities account for less than 55 percent of regional goals. Similarly, while housing needs in the North, Northwest, West, Southwest and South Shore subregions comprise only 22 percent of regional needs, 29 percent of the region's goals come from these subregions. An analysis of impacted and non-impacted communities shows this shift to be even more pronounced. While the region's housing needs are split almost equally between impacted and non-impacted communities, the housing assistance which will be provided to non-impacted communities will be 65 percent greater than the assistance received by impacted communities. Equally important is the emphasis on household type between impacted and non-impacted communities. Fifty-eight percent of all housing assistance provided to non-impacted communities will be targeted to families.

A major function of community housing assistance goals is to meet the housing needs of those lower income families expected to reside in non-concentrated communities on the basis of a number of considerations. As part of the methodology which determined housing needs discussed in Chapter 1, an expected-to-reside figure was calculated for all communities. Four numerical factors were included in this analysis:

- 1) Projected growth in low- and moderate-wage jobs,
- 2) The current number of low- and moderate-wage jobs,

- 3) Community fiscal capacity to support services to lower income households,
- 4) Indigenous community housing needs.

In addition, other considerations such as population growth, degree of concentration and land availability were evaluated vis-a-vis the initial family reallocation figures for each community. Finally, areawide and statewide plans (see Appendix E) were examined to assure consistency with previously adopted policies. Using the above calculations and analysis, a total family need of 5,500 units has been reallocated from 15 communities with concentrated lower income populations to the remaining 86 communities in the MAPC region.¹ This regional reallocation component has been incorporated into all community family needs figures.

Calculation of outreach goals is based on the difference between each jurisdiction's three-year family percentage goal and its relative percentage of the areawide housing assistance need. As described above, total family needs include a fair share or regional reallocation component. In the 86 positive outreach communities, family goals have been set at 15 percent of total family need and in each case positive outreach goals are proportional to regional reallocation component of family need. These calculations were based on the following formula:

$$\text{Outreach (\%)} = \frac{\text{Regional Reallocation} + (\text{Total Need minus Indigenous Need})}{\text{Total Family Need}}$$

Outreach goals and regional reallocation figures for all positive outreach communities are displayed in Appendix B of Volume 2 (Table 4.A.3).

The goals and outreach percentages developed above clearly mandate a shift from the housing assistance patterns discussed in Chapter 2. Thus, it is important that they are considered in the context of the allocations process described earlier in this chapter. Recent program emphasis by HUD and MHFA has resulted in an increasing reliance upon the Existing Section 8 Program to meet family housing assistance needs. In contrast, the majority of the goals for family housing under this AHQP can only be met with new construction and to a lesser extent, rehabilitation. The availability of existing rental units in areas targeted for positive outreach is negligible and the land available for development of family housing is substantial.

¹ These 15 communities are refereed to in the text as "negative outreach communities"--the remaining 86 communities are "positive outreach communities." MAPC will choose from each of these groups in identifying target jurisdictions for outreach (Section 891.503(d)).

Table 4.4: Rental Units and Land Availability for Positive and Negative Outreach Communities

Community Type	Rental Units(1)		Available Land(2)	
	Number	Percentage of Region's Total Rental Units	Number of Acres	Percentage of Region's Available Land
Positive Outreach Communities (86)	182,885	.37	430,886	.89
Negative Outreach Communities (15)	317,485	.63	52,488	.11

Sources: (1) U.S. Census, 1970. Additional calculations made by MAPC based upon building permit data. See Footnote 2, Table 2.2.
 (2) McConnell Air Photo Survey, 1972

The 86 communities with positive outreach goals contain only 37 percent of all rental units. As reported to MAPC, the vacancy rates for these communities tend to be quite low. Reliance on the Existing Section 8 Program to meet the needs of the indigenous lower income population, as well as those families expected to reside, will put enormous pressure on an already limited rental housing stock. For this reason, MAPC has chosen to emphasize new construction and rehabilitation within these communities, which contain over 89 percent of the land available for development. MAPC believes that this allocation scheme will benefit the elderly population as well by providing new housing for those persons living in larger units they no longer need or are able to support.

Clearly, if the AHOP is to be effective in its purpose of providing expanded housing opportunities for lower income families, a significant program shift from current funding patterns will be required. Recent trends reducing the amount of family new construction and rehabilitation funds must be reversed; while new construction and rehabilitation will continue to increase elderly housing choice, Existing Section 8 subsidies must also be made more widely available. Given this mandate from local communities participating in the AHOP, it is incumbent upon MAPC, HUD Central and Area offices, the state Executive Office of Communities and Development, and MHFA to develop alternatives to the present funding allocation process.

Chapter 5

Implementation Activities Under the Areawide Housing Opportunity Plan

Introduction

This chapter describes activities MAPC is prepared to undertake to increase housing opportunities for lower income households throughout the region. These activities include:

- strengthening criteria for A-95 Review of local applications for federal housing funds;
- promoting outreach and fair housing market practices;
- developing strategies to facilitate housing production in the public and private sector, particularly to remove barriers to assisted housing described in Chapter 3;
- implementing proposed AHOP bonus funding criteria that will reinforce and expand the above activities.

For some years, MAPC has been promoting housing opportunities by providing technical assistance to communities and increasing public awareness of housing needs through reports and other efforts. Under the Areawide Housing Opportunity Plan (AHOP), MAPC plans to expand current activities and extend its efforts into other types of initiatives.

A-95 Review Criteria¹

Since A-95 review and comment procedures for federally funded projects were put into effect a decade ago, MAPC has been serving as an A-95 clearinghouse for the Boston metropolitan region. In recent years, MAPC has been developing criteria to prioritize housing proposals by assigning high, medium, or low designations to each project application received. These designations are made to assist federal officials in allocating limited resources to community projects needed most in the MAPC region.²

¹This section meets requirements in HUD regulations 891.503(f)(1)(ii) "A-95 Review" is the directive under which federal agencies must refer requests for funds to state, regional and local public bodies. The purposes are twofold: first to ensure conformity with policies at those levels and second, to avoid duplication of programs effort and funding.

²See, for example, letter dated April 17, 1979 to HUD Area Office re: Public Housing Application.

Under the AHOP, MAPC would develop more extensive review criteria and a ranking system serving two purposes: first, to classify housing proposals as either acceptable or unacceptable; and second, to prioritize projects. In addition, special consideration will be given to projects in communities which have demonstrated initiative in providing lower income housing opportunities or have signed off on the AHOP and are trying to meet their goals accordingly.

The following sections set forth the A-95 evaluation system by outlining the basic criteria for project acceptability. Criteria for further prioritization are subsequently given, first for projects highly recommended and then for those in the recommended category. Some projects which meet threshold criteria of acceptability may not fall in either the highly recommended or recommended categories, unless special factors pertaining to the sponsoring community are sufficient to recommend them for funding. A summary checklist of these Review criteria is presented in Figure 5-A for easy reference.

1. Acceptable Project Criteria

The major factors governing the acceptability of housing project development from a regional perspective are as follows:

- a. The balance between family and elderly effort in the sponsoring community will be reviewed in detail. Regional effort has generally been skewed toward meeting elderly needs. MAPC has usually given higher priority to family assistance and, under the AHOP, this consideration will be paramount.
- b. All housing development proposals will be reviewed for consistency with the AHOP needs and goals. The goals established for individual communities will not be regarded as absolute ceilings on housing assistance. Initially, consideration will be given to communities which have not met their goals rather than those which have already made considerable progress.

Beyond these threshold guidelines for acceptability, MAPC, through its AHOP, has developed criteria to prioritize a subset of acceptable housing project proposals as either recommended or highly recommended.

2. Prioritization of Acceptable Projects

a. Highly Recommended Projects

Factors which would distinguish highly recommended projects include the following:

(1) Development in Areas of Low Concentration

For new construction, MAPC will give highest priority to projects in those communities where (a) indigenous need is relatively low, and (b) housing effort relative to housing need, particularly in those communities with substantial expected-to-reside figures, has been disproportionately low.

Figure 5-A

Summary Checklist for
A-95 Review Criteria Under the AHOP

1. "Acceptable" Project Criteria

- a. Family-Elderly Balance _____
- b. Housing Effort in the Project _____
 Community to Date _____

2. Prioritization of Acceptable Projects

a. Highly Recommended Factors

- (1) Development in an Area of Low Concentration _____
- (2) Interjurisdictional Mobility Factors _____
- (3) Large Family Units _____
- (4) Development Size and/or Mixed Income Occupancy _____

b. Recommended Factors

- (1) Introduction of Innovative Housing Concepts or New Housing Types in the Community _____
- (2) Housing Component of Mixed Use Development _____
- (3) Subregional Deficit in the Type of Housing Proposed _____

3. Special Factors Related to the Sponsoring Community

- a. Participating in the AHOP _____
- b. Local land use controls which encourage lower income housing _____
- c. Residency preferences eliminated by LPHA _____
 - (1) Entirely _____
 - (2) Percentage of units: _____%
- d. Sponsorship of or participation in outreach, counseling or affirmative action fair marketing activities _____
- e. Concurrence, where applicable, by other clearinghouses on previous projects _____
- f. Previous local housing effort _____
- g. Other local initiatives _____

(2) Interjurisdictional Mobility Factors

Given that the primary purpose of the AHOP is to increase access of lower income households to communities other than those in which they presently reside, high priority will be given to those projects where (a) a percentage of the units in the proposal project are to be set aside for non-residents and the development entity agrees to affirmatively market the availability of those units both through its own initiatives and AHOP-sponsored activities, (b) the sponsoring community has eliminated residency preferences in units managed by the local public housing authority, either altogether or on a percentage basis, or (c) the project is co-sponsored by two or more communities as a subregional effort to address local needs.

(3) Large Family Units

Given that elderly and small family needs throughout the region have been met to a much greater extent than large family needs, special consideration will be given to project proposals providing units with three or more bedrooms.

(4) Development Size and/or Mixed Income Components

Housing initiatives to economically integrate communities in the MAPC region should attempt to physically integrate the units made available to lower income households with those occupied by other income groups. For this reason, MAPC will place higher priority on projects committed to either (a) smaller-scale subsidized developments, or (b) occupants of mixed income.

b. Recommended Projects

Factors which would distinguish recommended projects from those simply meeting the threshold criteria for acceptability would include:

(1) Introduction of Innovative Housing Concepts or New Housing Types in the Community

Emphasis will be placed on those proposals which represent (a) a new type of housing within a community, thus expanding the types of housing opportunities in that jurisdiction, and/or (b) innovative concepts in providing housing opportunities in the region. New types of housing in communities where there has been little or no effort to provide assisted housing may comprise a public or subsidized housing development for elderly and/or

family occupants. Innovative concepts include initiatives such as congregate housing, and local housing authority acquisition of a percentage of condominium units in a private development at below market cost.

(2) Housing Components of Mixed Use Developments

Proposals in which housing comprises an element of an overall economic development or commercial revitalization plan will be given strong consideration. It should be noted that in the MAPC region, opportunities for mixed use revitalization projects exist in many outlying suburban and exurban communities which developed in the last century as small scale industrial centers. Thus, these projects may often provide housing opportunities in areas where housing needs for expected-to-reside or regional reallocation exist.

(3) Subregional Deficit in the Type of Housing Proposed

While a particular community may have provided a substantial number of elderly or family units, surrounding communities may have done little. In these instances, where there is a significant subregional deficit, MAPC may give additional consideration to the proposed project particularly if cooperative efforts with one or more of the surrounding communities are established in undertaking the project.

3. Special Factors Related to the Sponsoring Community

In addition to priority factors related to specific project proposals, MAPC will give consideration to special factors related to the communities sponsoring housing developments. These considerations include:

- a. Participation in the AHOP through initial sign-off and ongoing efforts to meet agreed upon three-year housing goals.
- b. Creative modifications of local land use controls which encourage greater diversity in types of housing and, in turn, greater access to dwellings in that community for lower income households e.g. adoption of an ordinance requiring a percentage of subsidized units within each new private housing development, and zoning by-law provisions for accessory apartments in single-family districts.

- c. Residency preferences for public housing eliminated either altogether or on a percentage basis by the local public housing authority.
- d. Local housing effort measured in terms of previous "acceptable" but not necessarily funded applications, particularly where one or more applications were designated as highly recommended by MAPC staff and subsequently were not funded.
- e. Other local initiatives have been undertaken to facilitate lower income housing opportunities.

In sum, MAPC will continue to review applications for funding at a planning level, evaluating applications on the basis of:

--acceptability relative to AHOP goals and objectives

--priority rankings, i.e., recommended or highly recommended beyond basic acceptability, either because of specific project elements or because of particular housing efforts by the sponsoring community.

Considerations more specific than planning criteria, such as financial and design aspects of proposed developments, cannot be appropriately evaluated by regional planning staff and thus will remain the prerogative of local officials and funding agencies.

Presently, MAPC A-95 review priorities may be taken into consideration by the HUD Area Office. As an integral part of a HUD-approved AHOP, MAPC would expect to develop an agreement with the HUD Area Manager under which HUD and MAPC would confer on initial program allocation within the MAPC region and work out a mutually acceptable funding schedule after HUD has received applications for funding. Given that 60 percent of the federal housing subsidy funds received in Massachusetts are expended in the MAPC region, MAPC staff should be involved, at the commencement of each fiscal year, in HUD's allocation sessions with the state Executive Office of Communities and Development (EOCD) and the Massachusetts Housing Finance Agency (MHFA).

Outreach and Fair Housing Marketing Activities¹

Overview

MAPC's outreach and fair housing marketing activities to date have focused primarily on MAPC staff technical assistance to local communities, developing regulatory policies, programs, or funding applications to

¹This section addresses the following provisions of HUD's Regulations: 891.503(d), (f)(1)(i), (iii), (iv) and (f)(2)(i) and (iv) and 891.606(a)(1), (2), (3), (4)

broaden housing opportunities for lower income households who are not necessarily residents of that community. MAPC has also, through funds acquired via its local assessment, developed an incentive grants program. Under this program, not only local governing bodies but also citizens' organizations and nonprofit corporations will be encouraged to submit proposals for matching funds for projects which would expand housing opportunities in the MAPC region. In addition, MAPC has maintained ongoing coordinated efforts with state, regional and local organizations specifically concerned with outreach and fair housing marketing activities, many of which are represented on MAPC's Technical Advisory Committee on Housing. These agencies include not only state agencies responsible for these efforts such as the Executive Office of Communities and Development and the Commission Against Discrimination, but also nonprofit citizens organizations and ad hoc groups such as the Mayor's Office of Fair Housing in Boston.¹

Under the AHOP, MAPC plans to significantly expand its role both in technical assistance and incentive grants funding, particularly if bonus funds are received under Subsection F.² MAPC's outreach efforts will focus primarily on areas with disproportionately low numbers of lower income households with an employment base and the fiscal capacity to support them, and where efforts to provide assisted housing have been minimal.³ Realistically, the greatest potential for realizing outreach goals in these areas will be among communities participating in the AHOP.⁴ Fair housing marketing efforts will be directed primarily in several subareas of the region where existing fair housing groups can serve as a local organizational base for disseminating information and providing counseling and referral services.

Given the client-oriented nature of many outreach and fair housing marketing activities, MAPC will draw on the expertise and resources of public and private sector organizations which have traditionally served in a counseling and referral capacity in the region. In doing so, MAPC will rely on the broad-based representation of its Technical Advisory Committee on Housing and strengthen it with additional participation by outside organizations,⁵ particularly nonprofit organizations engaged in advocacy activities and additional representatives from the real estate industry.

¹See Appendix F

²See final section in this chapter on Proposed Bonus Funding Criteria.

³See Chapters 1 and 2 regarding number of units needed and effort to provide assisted units to date.

⁴See Volume 2 re: individual communities participating in the AHOP.

⁵See Appendix F for list of MAPC's current TAC membership.

MAPC will build on its own strengths in technical assistance (particularly to local governments), public information, regional coordination, and monitoring and evaluation. MAPC will, wherever possible, enlist the organizational support of outside groups to accomplish the following objectives.

Areawide Housing Information and Referrals for Counseling Services

MAPC has consolidated information from various federal, state, and local administering agencies on assisted units in each community within the MAPC region. MAPC will develop public brochures to widely disseminate information on (a) locations of assisted units, particularly family units, which may be made available to non-residents, (b) how to apply for these units, and (c) public and private agencies which may be helpful in locating units currently available in suburban communities. If MAPC receives bonus funding, the Council intends to request applications from organizations, either currently providing, or with the immediate capability of providing, counseling and referral services to individual households seeking units in communities with positive outreach goals under the AHOP.

Development of Areawide Affirmative Fair Housing Marketing Goals and Strategies

There are presently three efforts related to developing fair housing strategies in the MAPC region. One is the Community Housing Resources Board, created under an agreement between the Greater Boston Real Estate Board and HUD in 1978. The major objectives of this board are to increase the awareness among real estate brokers and housing consumers of the fair housing laws and to encourage minorities to enroll in training and licensing programs to become practicing real estate brokers. MAPC has served on this board since its inception.

Secondly, in Boston, the Mayor's Office of Fair Housing has undertaken several activities including public brochures and posters advertising the content and import of fair housing laws. MAPC endorses these efforts to promote public awareness of the fair housing laws and the need for integrated housing opportunities.

Third, the Massachusetts Commission Against Discrimination now requires, as a part of its A-95 Review process, fair housing and fair employment practice agreements or assurances from applicant communities. These have been signed with the local governing bodies of the communities in the MAPC region and, on a cumulative basis, indicate a commitment on the part of local officials to the provisions of the fair housing laws.

To enhance these efforts, MAPC will work with state and federal funding agencies on "pre-occupancy" briefings and affirmative marketing commitments from developers seeking rental assistance funds for their units. MAPC will assist HUD and developers of subsidized units in identifying local groups which may be helpful in referring minority applicants to these developments. In addition, MAPC will provide technical assistance and possible funding to local officials and fair

housing organizations interested in conducting activities to promote housing opportunities for minorities in a subarea of the region comprised of impacted and non-impacted communities.

Activities To Enlist the Cooperation of Existing Public Housing Authorities to Increase Mobility of Lower Income Households

MAPC is currently requesting from each of its 101 communities, many of which have local housing authorities, a positive response to participate in programs to increase mobility of households eligible for public housing by (a) eliminating residency preference requirements either altogether or for a percentage of units they administer, (b) developing Section 8 certificate exchange programs between local housing authorities in impacted and non-impacted communities, and (c) working on new construction or substantial rehabilitation projects on a subregional basis.

Development of Programs Involving the Private Sector

MAPC is actively participating in a number of ongoing efforts to develop joint efforts, by both private and public sector, to increase housing opportunities. Among the more active of these groups is the Housing Task Force which has recently been convened, funded, and staffed by the Greater Boston Real Estate Board. This Task Force is intensively engaged in identifying housing problems in the MAPC region and proposing solutions in three major areas, including a subcommittee on Financing and Marketing which is central to outreach and fair housing strategies.¹ MAPC plans to participate in organizational efforts such as these and develop applicable and workable programs to further ongoing outreach and fair housing marketing activities.

Preparation and Dissemination of Areawide Guides and Analytical Reports Which Identify Housing Opportunities, Trends in Mobility and Housing Costs in the MAPC Region

MAPC will continue to develop published materials on opportunities for assisted housing in the MAPC region and problems associated with trends in the private housing market which may contribute to either exacerbating or solving housing problems in the MAPC region. These materials are directed not only at public sector officials, but also housing consumers, producers and investors. Housing-related materials which MAPC is currently developing include (a) a mortgage risk study which is assessing lenders' experience in the MAPC region with the objective of triggering private investment, particularly in urban areas which have been perceived as high risk neighborhoods (these perceptions are used to justify a practice known as "redlining" that contributes to the deterioration of existing housing stock);(b) a manual and public workshop

¹ The two other major issue areas are land supply and development and building and technology, which are key to facilitating Housing Production and will be discussed in the next section.

on adaptive reuse directed at public officials and private developers in urban and suburban communities alike who may be interested in utilizing obsolescent public buildings, e.g. schools and commercial space to create new housing units; and (c) a brief treatise on private housing market trends, property values and housing-related costs such as transportation modes and utility rates. The treatise will reassess the current housing needs situation and problem areas yet to be addressed by public policy or private initiatives.

In sum, MAPC will carry out outreach and fair housing marketing activities by offering technical assistance, preparing and disseminating public information and maintaining ongoing contact with public and private sector organizations actively involved in these efforts (drawing on the resources and input of these groups formally through the Technical Advisory Committee). In addition, MAPC will use its expertise in developing and reviewing project proposals for funding, monitoring, and evaluating these activities.

Facilitating Housing Production by the Private and Public Sectors¹

Introduction

There are four basic types of activities MAPC will undertake to strengthen its role in encouraging housing production in the private and public sectors: (1) technical assistance to local communities and private developers interested in creating publically assisted housing; (2) demonstration projects which combine intensive technical assistance along with MAPC-funded incentive grants or other additional funding; (3) monitoring local initiatives such as changes in zoning by-laws or applications for funding for purposes other than housing; and (4) public information activities including both literature and sponsorship of conferences and workshops on issues central to implementation of the AHOP.

Massachusetts has enacted several state laws including a statewide performance building code and zoning statutes to facilitate the construction of lower income housing which MAPC may utilize to assist communities in meeting their housing goals for the next three years. It should be noted that the MAPC region is comprised of 101 municipalities, each with its own jurisdictional enforcement powers over land use controls (both zoning and subdivision provisions), the building code, and local housing authority. Thus, many of the implementation activities on housing production undertaken by MAPC will be directed at collaborative efforts with local officials and private sector representatives who are usually involved in housing production on a subregional or regionwide basis.

Technical Assistance

MAPC plans to use its present staff to provide technical assistance to local officials and expand current initiatives to assist private developers in their efforts to provide lower income housing. MAPC will focus its technical assistance efforts under the AHOP in four areas.

- MAPC will assist communities in modifying local land use controls where local officials are interested in introducing zoning incentives for development of lower income housing. These technical assistance activities would be carried out jointly by MAPC's Land Use and Housing staff.
- The Council will provide arbitration services in cases where private developers are trying to undertake projects which would include a percentage of units for lower income households and have met with local opposition. MAPC has begun to offer its services in an effort to negotiate solutions which

¹ This section addresses HUD regulatory requirements 891.503(f)(1)(i), and (2)(i), (ii), and (iv).

are mutually acceptable to the developer and the local community and which conform to AHOP regional objectives of meeting family as well as elderly need. Under the state "anti-snob" zoning statute (Chapter 774), developers can appeal to the state Housing Appeals Board to override local zoning ordinances which produce the development of such a project. MAPC has found that, in some cases, a developer is interested and willing to negotiate alternative proposals with local officials rather than incur the expenses associated with a lengthy appeals process. It is also usually in the community's interest to work out a viable compromise than subject itself to a state-imposed mandate. From these specific projects, MAPC will develop materials for general dissemination and sponsor public workshops.

- MAPC will encourage rehabilitation efforts, particularly in communities with public buildings available for adaptive reuse for housing. In these efforts, MAPC would work with local officials in developing a prospectus for private developers review, and would assist in locating interested developers and evaluating their applications. MAPC is presently developing a manual and plans to sponsor a workshop on adaptive reuse.
- MAPC will incorporate housing as a component in economic revitalization projects. This is a potentially viable alternative to isolated districts zoned exclusively for residential purposes. This type of solution may be particularly appropriate for housing the elderly and physically handicapped persons who are less mobile, giving them more immediate access to goods and services, and enabling them to remain more self-sufficient even without automobile transportation. In some locations, these mixed-use developments will also be appropriate for family housing.

Demonstration Projects

MAPC plans to develop demonstration projects by soliciting requests from local officials for technical assistance and, where appropriate, funding assistance as well. For example, in recent months, MAPC has been approached by a local planning board which was negotiating with developers to acquire a percentage of units in condominium developments. The developer would sell to the local housing authority the units at cost in exchange for a permit to increase the number of units developed. MAPC was asked to identify programs appropriate to fund the acquisition of such units. In doing so, MAPC provided local officials with a working document which evaluated the appropriate federal and state programs, application procedures, and funding prospects. In another instance, MAPC sponsored a public workshop in which two panelists, a planning official and private developer, discussed an innovative local ordinance in one of the MAPC communities. This ordinance, which requires that 10 percent of the units in any newly constructed housing development be set aside for Section 8 recipients, was advocated by both the public official and the developer as a workable means to assure the creation of lower income units as an integral part of any housing development.

MAPC intends to expand the agency's role in assisting local initiatives by actively soliciting project proposals, particularly from those communities participating in the AHOP, interested private developers, and citizen organizations. Projects would include those which (1) facilitate housing production for lower income households by either the public or private sector, (2) involve local innovations, particularly modifications of land use controls, which may be applicable to other communities in the region.

Monitoring

MAPC plans to monitor changes in state or local provisions which may either facilitate or impede housing production in the region. Areas of state and local action which MAPC will monitor include:

- proposed changes in local zoning by-laws which may have a pronounced effect, either positively or negatively, on lower income housing development in that community.
- subdivision control requirements which may unnecessarily contribute to increased housing costs,
- building code requirements initiated by either the state commission or local enforcement officials which may make housing development unnecessarily expensive,
- activities of the state Housing Appeals Board, particularly formal decisions upholding or overturning local zoning by-laws on the basis of housing needs met, and
- state and federal programs funding allocations for housing and related projects in the region.

Public Information, Resource Centers, Conferences

MAPC will undertake a variety of initiatives directed at both dissemination of information and increased participation in housing production efforts. In this regard, MAPC plans to:

- develop a resource center of exemplary local zoning, subdivision, and permitting procedures which may facilitate the production of assisted housing including variable density requirements, flexible lot size requirements, allowances for cluster or planned unit development, and provisions for accessory apartments,
- create a central information and referral center on new developments in federal and state housing programs, related housing programs, and activities of private interest groups,
- sponsor public conferences on adaptive reuse and modification of local land use controls and contribute Council staff resources to planning and organizing conferences with various housing interest groups,

- develop and disseminate concise and readable literature for the general public on housing trends in the Boston metropolitan market generally and for lower income households specifically.

In sum, MAPC's housing production efforts will be directed at facilitating housing production by providing technical assistance to public and appropriate private sector representatives, creating incentives for innovative demonstration projects, monitoring ongoing activities and new developments, encouraging greater participation in these efforts by providing the general public with written information and sponsoring conferences to address major housing issues in the MAPC region.

Bonus Funding¹

Bonus funds will be essential to effectively pursue the implementation activities discussed in this chapter. These additional funds will be needed from each of the three programs, Section 8, Community Development Block Grant, and 701.

To qualify for bonus funds, MAPC is required to meet at least one of the following criteria:

- (1) Significant participation, initial funding or administration, in counseling and referral programs to assist lower income households in jurisdictions outside of areas where they presently reside;
- (2) Interjurisdictional use of the Existing Section 8 program by communities participating in the AHOP;
- (3) Elimination of residency preferences by the local housing authorities in all participating jurisdictions;
- (4) Participation in the development or implementation of an operative voluntary areawide fair housing marketing program;
- (5) Participation of 75 or more of MAPC's 101 municipalities in the AHOP,
- (6) Development or administration by MAPC of other activities which may be approved by HUD as meeting the objectives of the AHOP.

MAPC is applying under criteria (1), (2), (4), and (6) for bonus funding.

As discussed in the Outreach and Fair Marketing section of this chapter, MAPC is providing assistance in the development of housing information and referral services. Bonus funding will allow for a significant expansion of these efforts.

¹ This section addresses HUD regulations Subpart F (Special Allocations Based Upon Approved Areawide Housing Opportunity Plans), 891.601 to 891.607.

Regarding interjurisdictional use of Existing Section 8 certificates, there are at least two ways in which MAPC may meet this criterion. One is administrative mechanisms for eligible families from impacted areas to use their certificates in non-impacted areas. Currently such a program is administered by the state Office of Communities and Development in all jurisdictions in the MAPC region. Recently, this office has begun to provide a quarterly report to the local housing authorities to inform them of the number of state-administered units within their community. MAPC commends EOCD for this attempt to coordinate its rental assistance program with local officials. Another method of promoting interjurisdictional use of Existing Section 8 certificates is the elimination of residency preferences by housing authorities for these units, as required by current HUD policy. MAPC is working with communities interested in participating in an approved AHOP to meet this second criterion.

As stipulated under the fourth criterion, MAPC has been a member of the Community Housing Resources Board formed to monitor the Voluntary Areawide Marketing Agreement between HUD and the Greater Boston Real Estate Board. The scope and content of this Agreement and the Board's activities are discussed in the Outreach and Fair Housing Marketing section of this chapter.

MAPC has provided technical assistance and served as arbitrator in a series of activities which merit consideration under the sixth criterion. MAPC has recently engaged in the following activities:

- Technical assistance was given to a local planning board interested in modifying procedural requirements for multi-unit development permits to require a set-aside of 10 percent of the units for lower income households. (This was finally adopted by Town Meeting for a 100-unit development; 10 two-bedroom condominiums will be made available to the local housing authority at cost, a purchase price which is well below market.)
- A manual has been developed and workshop held on adaptive reuse of non residential buildings for housing. Based on inquiries from communities interested in participating in the AHOP, it is clear that adaptive reuse of older buildings such as schools may offer a means of providing assisted housing in outreach areas.
- Technical assistance is currently being given by the Housing staff on center revitalization projects which will provide assisted housing opportunities in two suburban communities.

Bonus funds would be used by MAPC primarily for three types of activities: regional outreach, fair marketing, and direct incentive grants to communities. Proposed outreach and fair marketing are discussed in the earlier section devoted to those activities. Direct incentive grants will be awarded on the basis of proposals and evaluated according to the following criteria:

- applications will be accepted from those municipalities which have agreed to participate in the AHOP, prior to its submission to HUD, and from nonprofit organizations with a proven track record in the type of activity they propose to carry out,

- the project emphasis must be consistent with family and elderly balance as delineated in AHOP goals and A-95 allocations procedures,
- project merit and feasibility,
- transferability to other communities i.e. the proposal would be a demonstration project consistent with the criteria outlined earlier in this chapter.

In addition to this criteria, special consideration will be given to projects meeting one or more of the following requirements:

- the proposed project will provide for increased interjurisdictional mobility for lower income persons,
- the proposed project represents a new initiative by the applicant community;
- the proposed project will promote adaptive reuse of an existing structure,
- the proposed project will promote the development of mixed income housing,
- the proposed project makes special provisions for handicapped persons, or
- the proposed project makes special provisions for large families.

Factors related to the sponsoring community will also be taken into consideration:

- the community has eliminated residency preferences in public housing or has made significant progress in removing private market barriers such as those discussed in Chapter 3,
- the proposed project is part of a comprehensive design for economic development or center revitalization.

The importance of Bonus Funds in achieving AHOP objectives cannot be underestimated. It is anticipated that many of the Bonus CDBG fund recipients will be receiving such funds for the first time. Section 8 funds (New Construction, Substantial Rehab and Existing) are to be requested in proportion to the regional three-year goals in these program categories. These funds will be essential to meet the current funding shortfalls documented in Chapter 4. Finally, additional 701 monies will enable MAPC to expand technical assistance, monitor and evaluation activities in the region. By coordinating these efforts with other MAPC policy areas, encouraging and assisting communities in formulating proposals, and funding regionally directed activities for subsidized housing, MAPC can begin to meet the goals of the AHOP.

Enclosure B

Index of Documents¹

Enclosure A -- Letter of Transmittal

Enclosure B -- Index of Documents

Enclosure C -- Statement of Conformity to Requirements

Areawide Housing Opportunity Plan

Volume 1: Summary Data, Findings and Proposed Implementation Strategies

Chapter 1	Housing Needs
Chapter 2	Geographic Concentration of Lower Income Households and Minorities in the MAPC Region
Chapter 3	Development Patterns in the MAPC Region
Chapter 4	Goals for Distributing Housing Assistance
Chapter 5	Implementation Activities Under the Areawide Housing Opportunity Plan

Volume 2: Technical Appendices for Reference and Administration of the AHOP

Appendix A	MAPC-AHOP Compliance with HUD Regulations
Appendix B	Individual Community Tables
Appendix C	Housing Needs Methodology
Appendix D	Sign-Off Letters and Compliance with HUD Requirements for Approval Procedures
D-1	Citizen Participation

¹This Index addresses HUD Requirements specified in Section 891.505 (b)(2)

- D-2 Sign-Off Letters from Individual Communities
- D-3 Motion by Executive Committee and Recommendation to Executive Committee by the Technical Advisory Committee on Housing
- D-4 Consistency Between Goals Established Under Housing Assistance Plans and Areawide Housing Opportunity Plans.
- D-5 Discussion of Responsibilities of Participating Jurisdictions
- Appendix E Areawide and Statewide Plans
- Appendix F Technical Advisory Committee on Housing--Membership by Occupation

Enclosure C

Statement of Conformity¹

HUD Requirements
(Subpart E)

MAPC Response

§ 891.503 Required contents of approvable plans.

(a) An areawide assessment, based upon reliable and uniform data using consistent definitions and sources, of the housing assistance needs of lower income households (including households displaced or to be displaced by governmental action). This assessment shall, as a minimum, indicate housing assistance needs by (1) household type (elderly and/or handicapped; family; large family), (2) housing tenure (owner and renter), (3) female heads of household and (4) minority households. In addition, the assessment shall indicate needs by household type and by housing tenure for each county and for each jurisdiction of over 25,000 population.

Summary of areawide needs and methodology used presented in Chapter 1 of Volume 1. Detailed documentation on needs in Table 1 series of Appendix B; methodology, Appendix C.

(b) A procedure for distributing housing assistance among all jurisdictions (including non-Participating Jurisdictions) within the Plan area in accordance with the program objective. The procedure shall reflect:

Chapters 4 and 5 in Volume 1.

(1) The assessments of current needs developed in accordance with § 891.503(a);

Chapter 4, particularly page 4-8.

(2) Current and projected (for at least three years) changes in the regional population and its distribution among jurisdictions in the Plan area, with particular emphasis on population data and trends applicable to lower income persons;

Chapter 3, Table 3.1 and page 3-3; individual community detail in Appendix B, 3.

(3) An assessment of the number of those lower income households which could be expected to reside in each jurisdiction in the Plan area on the basis of current location of employment or future (for at least three years) employment opportunities and the need for spatial deconcentration in accordance with the program objective (taking into account present and potential areas of undue concentration of low income and minority households within the Plan area).

Chapter 3, Table 3.2 summarizes employment trends; individual community detail in Appendix B, Table 3.A.2.

Expected to reside calculations incorporated in needs methodology summarized in Chapter 1 and documented in Appendix C.

Undue concentrations of households and assisted housing discussed in Chapter 2; individual community detail given in Table series 2 of Appendix B.

(4) The present locations of assisted housing and jurisdictions with undue concentrations of such housing;

Appendix B, Table 3.A.8.

(5) For jurisdictions with HAPs, other pertinent data and factors identified in the HAPs of jurisdictions in the Plan area, such as rehabilitation resources, vacancies and those items identified in the HAPs as "limiting factors";

¹This Enclosure addresses H.U.D. requirements specified in Section 890.505(b)(3). It has also been enclosed as Appendix A.

(6) The present or potential capacity of each jurisdiction in the area to accommodate assisted housing, based on appropriate factors such as land availability, actual and relative fiscal capacity among jurisdictions to provide necessary community facilities and services, etc.;

Land availability documented in Chapter 3, Table 3.7 and in Appendix B, Tables 3.A.5 and 3.A.6; fiscal capacity incorporated in needs methodology (see Appendix C) and discussed Chapter 3, Table 3.4 and Appendix Table 3.A.3.

(7) Areawide policies for community development, economic development, growth, land use, transportation, and environmental protection which have been adopted or are being developed by the APO.

Appendix E.

(c) Annual and three year percentage goals for the distribution of housing assistance which have been derived from the distribution procedure and which can be translated into numerical goals. Percentage goals shall be established as a minimum for each county and for each jurisdiction of over 25,000 population (whether or not it is a Participating Jurisdiction) within the Plan area. The goals shall address the needs identified in § 891.503(a). As a minimum, the three year goals shall be specific as to household type (elderly and/or handicapped, family, large family) and housing tenure (owner, renter). The annual and the three-year goals shall be specific as to housing type (new, rehabilitated, existing). The goals shall take into account all lower income housing assistance which is currently or potentially available through Federal, State, local or private programs.

Chapter 4 and Table series 4 in Appendix B

The goals identified in the Plan and those identified in the HAPs covering Participating Jurisdictions are to be generally consistent in terms of the annual and three-year goals by housing type and for the three year goals by household type.

Appendix D-4.

(d) Identification of target jurisdictions for outreach activities based on interjurisdictional outreach goals.

(1) The Plan must identify jurisdictions (whether or not they are Participating Jurisdictions) within the Plan area to which the outreach activities required under § 891.503(f)(1)(iv) will be directed. As a minimum, the APO shall include as target areas each county and each jurisdiction over 25,000 population which have interjurisdictional outreach goals (by household type) based on the following calculation:

Chapters 4 and 5 and Table series 4 in Appendix B.

(i) The difference between the jurisdiction's three year percentage goal (§891.503(c)) and its relative percentage of the areawide housing assistance need (§891.503(a)) divided by (ii) the jurisdiction's three year percentage goal. For example, Community X has 10 percent of the areawide need for large families, and its percentage goal is fifteen percent of the housing assistance becoming available which might address this need. The outreach goal is determined by subtracting the needs percentage (10 percent) from the goals percentage (15 percent). The difference of five percent is divided by the goals percentage (15 percent). The result, 33½ percent, is the outreach goal. If the jurisdiction's percentage of the areawide need is equal to or greater than its three year percentage goal, there need not be an outreach goal. However, such jurisdictions will be expected to affirmatively further fair housing on a general basis. If the three year percentage goal is higher than the jurisdiction's percentage of areawide need, then an outreach goal is indicated. In addition, the Plan may designate additional jurisdictions which should have outreach goals and activities to increase opportunities for non-residents.

Appendix B, Table 4.A.3.

(2) The Plan also shall establish outreach goals for each target jurisdiction. These goals may be determined by employing the calculation in paragraph (d)(1) of this section, or another methodology acceptable to HUD which establishes goals for outreach activities designed to provide access to housing opportunities for residents or jurisdictions with undue concentrations of low income or minority households.

Appendix B, Table 4.A.4; fair housing activities for these negative outreach (and positive outreach communities) discussed in Chapter 5.

(e) Identification and analysis of all known legal, administrative or other barriers (e.g., residency preferences or requirements, exclusionary zoning, etc.) which restrict the choice or otherwise hinder the fair and equal access of lower income households, particularly large families and minority and female-headed households, to take advantage of available or potentially available housing opportunities (whether assisted or not) outside areas and jurisdictions which contain undue concentrations of low-income or minority households in the Plan area.

Appendix B, Table 4.A.3.

Land Use controls discussed in Chapter 3, Table 3.5 and 3.6 and documented by individual community in Appendix B, Tables 3.A.4, 3.A.6, and 3.A.7. Residency preference policies and provisions for accessory apartments documented in Table 3.A.7.

(f) Activities to implement the Plan.

(1) Implementation activities shall, at a minimum, include the following:

(i) Activities designed to remove legal, administrative or other barriers which limit housing opportunities identified in accordance with paragraph (e) of this section, such as the elimination of exclusionary zoning, removal of restrictive building codes or site plan requirements, development of areawide affirmative fair housing marketing goals and strategies, implementation of measures to increase the efficiency of administrative processing of applications for building permits, etc.

Chapter 5.

(ii) Use of the APO's A-95 review powers to ensure that not only housing but other local and areawide activities which are subject to APO review under HUD regulations implementing OMB Circular A-95 support the program objective;

(iii) Activities to enlist the cooperation of existing PHAs (and/or efforts to create an areawide PHA or other entity) to operate programs designed to achieve the program objective;

(iv) Outreach activities to achieve the program objective for matching eligible families with suitable and available housing assistance resources, such as through an areawide housing information, referral, and counseling service. These outreach activities shall be directed towards achieving for each jurisdiction the outreach goal identified in accordance with § 891.503(d) in the occupancy of newly-available assisted housing distributed pursuant to the Plan.

(2) Other implementation activities may include, but need not be limited to, the following:

(i) Coordinating the use of supportive resources such as Community Development Block Grants or other Federal, State, or local funds for activities which will help implement the Plan, such as site acquisition and preparation, development of community facilities and supportive services, support of outreach to households in areas and jurisdictions of undue concentration to advise them of available housing opportunities, etc.;

(ii) Provision of technical assistance to PHAs or prospective developers and sponsors in identifying sites, obtaining financing, etc.;

(iii) Preparation and dissemination of areawide guides which identify housing opportunities for lower income households.

(iv) Development of programs involving the private sector (financial institutions, developers, realtors, local fair housing and civil rights groups, etc.) in activities to implement the Plan, such as affirmative marketing, expansion of loan or credit availability, etc.

(g) Evidence of agreement between the APO and each Participating Jurisdiction (or with a county on behalf of certain Participating Jurisdictions, as provided in § 891.504(a)) on the housing assistance goals established under paragraph (c) of this section and of agreement on implementation activities in accordance with paragraph (f) of this section.

(i) For Participating Jurisdictions with approved HAPs, this evidence shall include (i) general consistency of the goals in the HAP with the goals in the Plan (or a commitment to achieve

Chapter 5 (continued).

Appendix D-2

Appendix D-4, in conjunction with Appendix D-2.

consistency as evidenced by a letter from the Chief Executive Officer on behalf of the governing body of the Participating Jurisdiction indicating the jurisdiction's intent to amend its HAP to be generally consistent with the Plan) and (ii) evidence of supportive community development or other implementation activities. In addition to the above, this evidence may include a narrative statement in Table III of the HAPs of Participating Jurisdictions requesting that a State or agency thereof (including HFDAs) submit applications for assistance for local government review and comment in accordance with § 891.201 of Subpart B of this part.

(2) For Participating Jurisdictions without approved HAPs, this evidence shall include (i) an individual written agreement from the Chief Executive Officer on behalf of the governing body of the Participating Jurisdiction or (ii) an equivalent demonstration of commitment to the program objective and implementation activities by the Participating Jurisdiction which is acceptable to the Secretary e.g., through commitment of funds in support of implementation activities, removal of barriers to housing opportunities or the provision of lower income housing, or cooperation in efforts to meet the criteria for priority Approved Plans in § 891.606.)

Appendix D-2.

§ 891.501 Additional requirements for approvable Plans.

(a) The Plan shall apply to and include as Participating Jurisdictions at least fifty percent of the jurisdictions in the Plan area, and Participating Jurisdictions shall represent at least seventy five percent of the population of the Plan area. For the purposes of counting Participating Jurisdictions, in lieu of separate evidence of agreement with the APO required under § 891.503(g), any jurisdiction within a county which is a Participating Jurisdiction may be counted as a Participating Jurisdiction if (1) the county's agreement with the APO on percentage goals applies to that jurisdiction and there is a county-wide PHA, or the county has reached agreement on percentage goals and implementation activities with that jurisdiction and the Plan provides written evidence thereof; and (2) the agreement between the county and the APO specifies general locations for assisted housing within that jurisdiction if it is not covered by an approved HAP.

Appendix D-2.

(b) The Plan shall have been approved by the governing body of the APO.

Appendix D-3.

(c) The Plan must be accompanied by satisfactory evidence that it can be implemented. This evidence should include, but is not limited to, (1) the availability of sites for new construction or substantial rehabilitation,

Land availability documented in Chapter 3, Table 3.7 and Appendix B, Tables 3.A.5. and 3.A.6.; sites for new construction and rehabilitation in Table 4.A.6.

where applicable, which are consistent with the program objective and which can meet the applicable housing program standards in those jurisdictions in which the Plan proposes the use of newly-constructed or rehabilitated

housing; (2) developer/sponsor interest in programs for lower income housing (e.g., as evidenced by proposals in response to recent Notifications of Fund Availability or invitations for housing applications); (3) the willingness and ability of established PHAs to administer or otherwise participate where goals have been assigned for a program which requires the participation of a PHA, or actions taken by jurisdictions to establish PHAs or to negotiate agreements with existing PHAs to perform this function; (4) commitment of, or satisfactory progress in committing contract authority currently allocated to the Plan area (for the Section 8 Existing Housing Program, consideration shall be given to the occupancy status of approved programs in order to assess the absorption capacity of the Participating Jurisdiction); (5) where the Plan proposes use of the Section 8 Existing Housing Program, sufficient vacancies with adequate rents to support a feasible program consistent with the program objective; and (6) cooperation by Participating Jurisdictions in removing impediments to the provision of lower income housing which have been imposed by local governments.

Chapter 4, particularly Tables 4.1 and 4.2 and accompanying text.

(d) The Plan shall include evidence that it has been and will be coordinated with appropriate State and areawide agencies, including A-95 clearinghouses and HFDAs, to ensure general consistency of data on areawide needs between the Plan and any State or other areawide housing and housing-related plans applicable to all or part of the Plan area.

Appendix D-4.

(e) The Plan shall include evidence that it has been and will be used in the A-95 review of all applications for community development, housing assistance and all other programs or activities which are subject to APO review under HUD regulations implementing OMB Circular A-95.

Chapter 5 and Appendix D-4.

§ 891.505 Procedures for submission of requests for Plan approval.

(a) Requests for Plan approval may be submitted to HUD at any time. The original copy of each request shall be submitted to the Assistant Secretary for Housing—Federal Housing Commissioner, Department of Housing and Urban Development, 451 Seventh Street SW., Room 9100, Washington, D.C. 20410. In addition, two copies shall be addressed to the Regional Administrator serving the Plan area. In the event the Plan area is served by more than one Regional Office, the request shall be submitted to the Regional Office which serves the largest geographical portion of the Plan area. All requests shall be submitted to each required addressee at the same time.

(b) Each request for Plan approval shall consist of:	
(1) A letter of transmittal signed by the chief executive of the APO submitting the request;	Covering letter, Enclosure A.
(2) An index of all documents and materials submitted with the request;	Enclosure B accompanying transmittal letter.
(3) A statement which addresses the Plan's conformity to each of the requirements contained in §§ 891.503 and 891.504 and discusses how the Plan, including implementation activities, meets the program objective;	Enclosure C and detailed reference in Appendix A.
(4) A list of all jurisdictions within the Plan area, identification of Participating Jurisdictions; identification of jurisdictions covered by approved HAPs; and, identification of jurisdictions targeted for outreach activities with their specific outreach goals, determined in accordance with § 891.503(d). Specific outreach goals need not accompany requests for Plan approval submitted before June 30, 1978. However, all Requests submitted before that date must include a schedule for establishing such goals by June 30, 1978. Any Plans submitted after June 30, 1978 must contain outreach goals for each target jurisdiction;	Appendix D-2 Appendix D-4 Appendix B, Table 4.A.3
(5) Identification of the relative degree of concentration of low income households and of minority households for each jurisdiction in the Plan area, and, if information is readily available, identification of areas of undue concentration within individual jurisdictions;	Appendix B, Table 2.A.1
(6) A discussion of the methodology and sources of data used in assessing areawide housing assistance needs under § 891.503(a);	Appendix C.
(7) A statement of the factors and overall strategy used to determine the household type and the suitability of housing type in establishing and assigning the percentage goals for each jurisdiction (or identifiable category of jurisdiction) in accordance with § 891.503(c);	Chapter 4.
(8) A narrative explanation of the process or procedures to be used by the APO to determine the geographic distribution that it will recommend be provided in accordance with the housing assistance goals identified in the Plan (i) in the event the amount of contract or budget authority made available within the Plan area is insufficient to accommodate the areawide goals in any fiscal year or (ii) in the event unanticipated resources from other sources become available.	Chapter 4.
(9) A discussion of the respective responsibilities of the Participating Jurisdictions for the implementation activities, including activities to be undertaken by the State and private agencies or organizations, as appropriate;	Chapter 5 and Appendix D-5.
(10) For Participating Jurisdictions that are not covered by a HAP, the	Appendix B, Table 4.A.6.

general locations (by census tract or other appropriate subjurisdictional delineation) proposed for assisted housing in accordance with the percentage goals in §891.503(c); for Participating Jurisdictions covered by approved HAPs, a discussion of whether the proposed locations identified in the HAP are consistent with the program objective and if not, what actions are planned to correct these inconsistencies in accordance with the program objective;

Appendix B, Table 4.A.6.

(11) A summary of the recent experience of jurisdictions within the Plan area with federally or non-federally assisted housing programs, including the status and amount of housing assistance (or the number of units provided with such assistance) received by each jurisdiction during the current federal fiscal year and each of the previous two fiscal years (broken down by housing type and by household type to the extent this level of detail is available);

Appendix B, Table 4.A.5 gives detail for individual communities; summary given in Chapter 4.

(12) Where the Plan has been in effect for twelve or more months, the impact of the Plan on the distribution of housing assistance and its success in addressing the program objective within the Plan area since approval of the Plan, or an earlier version of the Plan, by the governing body of the APO;

Not applicable.

(13) A description of the citizen participation process used in the development of the Plan, either in accordance with requirements under section 701 of the Housing Act of 1954 as amended or in accordance with State or local requirements, including a description of the opportunities for and the methods of participation that were available to public and private agencies and organizations;

Appendix D-1.

(14) Copies of comments submitted by other areawide clearinghouses or a statement describing coordination activities undertaken in accordance with §891.504(d).

Appendix D-4.

(c) In lieu of a separate and distinct discussion of any or all of items required in subparagraphs (4) through (14) of this paragraph, the APO may, at its option, provide an index which refers to any other portion of the Plan or the request which specifically responds to these items.

Enclosure B.

(d) If a portion of the area served by an APO is also served by another APO and both submit a request in the same federal fiscal year, the area served by the APO with the smaller geographic area of coverage may be included in that of the APO with the larger geographic area of coverage for the purpose of submitting requests or for counting Participating Jurisdictions in accordance with §891.504(a) if the Plan covering the area meets all applicable requirements under this Subpart. However, each Plan must meet all applicable requirements in order to be considered independently for approval.

No card

